



26 November 2021

Major Projects Team
Department of Planning, Industry & Environment
4 Parramatta Square
12 Darcy Street,
Parramatta, NSW 2150

RE: QIC Submission to SSD-9653-Mod-1 Concept State Significant Development Doran Drive Plaza Precinct

Dear Sir/Madam,

This submission has been prepared on behalf of QIC Limited in relation to the exhibition of SSD-9653-Mod-1, which seeks to modify the consent to Concept SSD-9653 approved on 29 January 2021 for:

“Concept development application for a mixed-use precinct known as Hills Showground Station Precinct including:

- concept subdivision, road hierarchy and precinct layout*
- maximum building envelopes ranging from 12 m to 68 m*
- maximum gross floor area (GFA) of up to 166,486 m², including up to 152,546 m² of residential accommodation and up to 13,940 m² of commercial premises*
- residential development of up to 1,620 dwellings*
- minimum 5% of all residential dwellings provided as affordable housing (for a minimum of 10 years)*
- open space and public domain areas*
- establish car and bicycle parking rates”*

This Section 4.55(2) modification application seeks to modify Condition B1 of the consent so as to amend the approved parking rate established for retail development in the Doran Drive Precinct which will facilitate the provision of a full-line supermarket.

Overall, QIC supports the construction of a mixed-use transit-oriented development that promotes the use of the Hills Showground Metro station at 2 Mandala Parade, Castle Hill, however objects to the proposed modification of Condition B1 to increase car parking.

QIC is the largest landowner within the Castle Hill strategic centre, owning approximately 17.5 hectares of developed and undeveloped land, located adjacent to and entirely within a 600m radius of the Castle Hill Metro Station. Castle Towers and Castle Mall shopping centres together are one of the largest employers within The Hills Shire local government area and are the premier destination for retail, services, recreation, and leisure for Sydney's North West.

The existing QIC landholdings support the growing Hills Shire population and has the potential to significantly to contribute to creating a vibrant centre that improves quality of life and amenity of the existing and future community of Castle Hill. However, unlocking this potential requires certainty around the viability of the centre prevailing as the primary retail offering centre for the area. The proposed full line supermarket and increase in retail car parking is inconsistent with the principles of transit-oriented development (TOD) and will result in increased traffic congestion and discourage use of the metro.

Our submission outlines the key issues and reasons for objection. QIC welcomes the opportunity to discuss further with you how a cooperative planning approach to strategic centres in Sydney's North West can drive significant positive outcomes for the community and the economy of The Hills Shire.

1. Comments on Concept SSD-9653-Mod-1

The following sets out our comments on the proposed modification of the Concept DA for the Doran Drive Precinct based upon our review of the documentation accompanying the application.

1.1 Inconsistency with the original intention of the Concept DA SSD-9653

Concept SSD-9653-Mod-1 seeks to modify Condition B1 to allow a maximum car parking cap of 341 spaces for retail development in the Doran Drive Precinct, or 1 space per 32sqm, whichever is lower. This car parking rate modification is consistent with that sought by SSD-15882721 which seeks consent for the construction of the Doran Drive Plaza Precinct.

As shown in **Table 1** below, the proposed 341 retail car parking spaces 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. This subsequent Section 4.55(2) modification application to adjust the car parking rates to enable the provision of a 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	Proposed in SSD-9653-Mod-1
84-182 spaces	341 spaces
1 space per 60m ² (max.) – 130m ² (min.) of retail GFA	1 space per 32m ²

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. By modifying Condition B1 in this way, the strategic purpose and intention of the Concept DA as a TOD precinct will be defeated.

1.2 Inconsistency with statutory Design Excellence requirements

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:

(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,

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 raises the question as to whether the proposed development would continue to exhibit design excellence in accordance with The Hills LEP 2019.

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.

1.3 Deviates from intended transit-oriented development

The site is situated along the new Metro North West Rail Line 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.

This is identified within various government strategies and planning policies including:

- 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).

Specifically, the *Greater Sydney Region Plan – A Metropolis of Three Cities*, *Central City District Plan* and *Hills Future 2036: Local 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 the 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 Metro North West Rail 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 proposed modification 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 compromise the TOD credentials of the precinct. This should be addressed in a revised Supermarket Plan of Management.

1.4 Traffic and transport impacts

The Applicant provides two likely outcomes which would result from not modifying Condition B1 to increase the approved parking rate.

The first is that “*a full-line-supermarket would not be provided in the Doran Drive Precinct. This is because supermarket operators would be concerned that a significant proportion of customers within the trade catchment*



area would choose to do their supermarket shopping at places where parking is available at conventional rates, even if this means driving further”.

The second is that *“if a full-line supermarket is provided, car parking will spill out into local residential streets”.*

These two prospective outcomes are clear indications that the site is not suitable for a full-line supermarket whereby its commercial viability is reliant on excessive car parking provision which is not suitable for the Showground Station Precinct as a TOD site.

When reviewed with the documentation lodged with SSD-15882721 (which seeks the same change in car parking rates), it is evident that 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 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.

The traffic generation assessment provided with SSD-15882721 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.

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.

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 ongoing impacts of COVID. The SIDRA analysis should be revised to reflect typical traffic demands more accurately.

Conclusion

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 development's intention to increase housing and best optimise investment of the North Metro West Rail Line, concern is raised about the proposed full-line supermarket and subsequent increase in carparking. Specifically, the implications of this on the long term strategic centre capabilities of QIC's assets in Castle Hill.

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:

- The overall strategic intent for the proposed Doran Drive Precinct as a TOD is supported and will make a contribution to achieve housing targets.
- The parking rates approved under the original Concept DA (84 – 182 spaces or 1 space/60m² – 1 space/130m²) were purposefully imposed so as to maintain a manageable burden on the traffic and parking infrastructure of the local road network and to instead encourage shopper to utilise the new Sydney Metro as the more appropriate mode of transport.
- Condition B1 should therefore not be amended to increase parking above the approved 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 delivery of



design excellence in accordance with The Hills LEP 2019 which aims to encourage sustainable transport and reduce options for car use.

We look forward to the opportunity to continue to work together with Council to create a vibrant town centre in Castle Hill to meet the needs of the existing and future community.

Yours faithfully,

David Tewksbury
Investment Manager

A handwritten signature in black ink, appearing to read 'D. Tewksbury', written over a light blue horizontal line.