



THE HILLS
Sydney's Garden Shire

THE HILLS SHIRE COUNCIL
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8 October 2020

James Groundwater
NSW Planning, Industry & Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Email: james.groundwater@planning.nsw.gov.au

Our Ref: FP223
Your Ref: SSD-9653

Dear Mr Groundwater

RESPONSE TO SUBMISSIONS – SHOWGROUND STATION PRECINCT STATE SIGNIFICANT DEVELOPMENT APPLICATIONS (REVISED CONCEPT)

Thank you for the opportunity to provide advice on Landcom's Response to Submission (RTS) documents for the above SSDAs. It is noted that Council made a detailed submission on the SSDA 10 December 2019, which represents Council's adopted position on this matter. Council officers have subsequently provided comments to Landcom on 13 July 2020 in relation to their revised plans. In a number of instances, the revised proposal does not adequately address Council's previous comments. This letter highlights areas of particular concern and reiterates Council's position on each of these matters.

Built Form & Density

- Whilst it is acknowledged that amendments have been made which will reduce the proposed yield from 1,900 dwellings to 1,620 dwellings, the revised yield is still beyond the 1,500 dwellings envisaged in the concepts put forward by the Department of Planning, Industry and Environment as part of the Priority Precinct exhibition.
- Council officers have consistently raised concern with the excessive bulk, scale and density of the proposed development. The subject site is an opportunity for an iconic development with world class design and outstanding amenity. The proposal appears to be seeking to maximise development yields at the expense of achieving these outcomes. The density proposed for this site should not inhibit the achievement of exemplary built form and amenity outcomes envisaged under The Hills Development Control Plan.

Building Separation

- Separation of less than 24 metres between towers is considered to be inadequate for a master planned site. Consideration should be given to providing greater separation between towers of 40 metres where possible.

Open Space

- The public open spaces identified within the Plans are critical components of achieving a 'great place' at this location and are reasonable and necessary inclusions as part of a development scheme of this size and density. Any SSDA approval should provide sufficient certainty that these outcomes will occur as an integral part of the development and require any future developer to provide these publicly accessible open spaces as part of their development. The SSDA approval must mitigate any risk to Council or the community associated with a future developer seeking to amend approved outcomes to remove these spaces.

Mid-block Link (Doran Drive)

- The Showground will be a destination with potential for large crowds, especially during major events. It is likely the pavement capacity will be exceeded and pedestrians will traverse from the station to the showground on the Doran Drive road pavement during events. A cross site link may mitigate this during periods of peak flow. It is noted that the block width is 71 metres.
- Development proposed within the Doran Drive Precinct will cast a shadow over the majority of the station plaza between 12pm and 3pm during mid-winter, substantially reducing the amenity and usability of this space. In addition to enhancing accessibility, a mid-block link through this precinct would assist with mitigating the visual bulk and scale of buildings and potentially enhance solar access to the station plaza.
- The statement by the design team that it would be difficult for the cross site link to meet CPTED requirements is not supported. Three precedents the design team should consider are:
 - Waterloo metro precinct which provides two cross site links - one being a shared pedestrian car access and one a pedestrian only cross site link (the block width is 63 metres).
 - World Square, which has a 135 metre block width and successfully incorporates a number of cross site links and an internal plaza. Ample passive surveillance is provided day and night through the incorporation of shop frontages addressing the cross site link, and
 - Kiora lane in Double Bay, which has a pedestrianised lane width of 6-9 metres over a length of 179 metres.

Upper Level Setbacks (Secondary Setbacks)

- The current urban design concept retains 3 metre upper level setbacks. As per Council's submission, it is recommended that the minimum upper level setbacks within the Doran Drive Precinct and Precinct East be 5 metres.
- Precinct East New Street: The balconies above the 4 storey podium should not protrude into the secondary setback area.

Building Lengths

- It is noted that the length of a number of buildings has reduced. It is recognised that Precinct West is constrained however buildings with lengths of more than 50 metres in this location should be discouraged.

Site Coverage

- Lot 1 within Precinct East includes a site coverage of approximately 61%. Landcom's justification is that the site area has been reduced to allow the dedication of open space. Whilst the provision of open space is supported, Council's maximum site coverage control seeks to provide for significant landscaped areas, recreation spaces and separation of

buildings on individual development sites. It is therefore considered reasonable that all sites comply with the 50% site coverage control within Council's DCP.

Apartment Mix

- Apartment mix and sizes that comply with Council's Housing Diversity requirements (Clause 7.11 of The Hills LEP) are recommended. Clarification is also requested on whether minimum terrace / townhouse provision for certain lots will be stipulated in any approval plans and whether the proposed townhouses within Precinct East are included within the identified 'apartment yield' or whether these are over and above the proposed 1,620 dwellings.

Deep Soil Zone

- The concept masterplan should demonstrate that each lot is able to comply with the minimum deep soil requirements within the Apartment Design Guide. As you would be aware the minimum dimension requirements within the ADG for deep soil areas (on sites with an area of more than 1,500m²) is 6 metres.
- All OSD tanks are to occur within paved areas where practicable and not in areas earmarked for deep soil.

Parking

- The comments raised in Council's submission are maintained. Concern is reiterated with respect to the proposed parking rates (0.6 – 1.5 spaces per unit, 1 visitor space per 10 units, 1 space per 145m² of commercial gross floor area and 1 space per 130m² gross retail floor area). It is recommended that parking rates for residential flat buildings be included within the Urban Design Guidelines which are consistent with Council's housing diversity provision (Clause 7.11 of The Hills LEP - 1 space per apartment and 1 visitor space per 5 apartments).

Approval Process & Design Excellence

- Any future proposal on the subject site should be assessed through the established local assessment and approval process, including consideration by the Sydney Central City Planning Panel and Council's Design Review Panel which comprise of members with suitable local knowledge and expertise and have been approved by the Government Architect. Based on this approval pathway, Council's DRP should consider future DAs as per the existing requirement under Clause 8.6 of The Hills LEP.

Proof of Concept

- As noted within Council's previous submission, it is recommended that the proof of concept be peer reviewed by a Government Architect-approved consultancy to ensure its quality and accuracy.

School

- It is acknowledged that consultation is being undertaken between Landcom and School Infrastructure NSW in relation to the need and potential location for a new school. It is reiterated that identification of a school site (ideally within the subject development) should be undertaken as a priority. The subject application should not be approved ahead of resolving this issue.

Local Infrastructure

- As advised in Council's previous submission, it is not considered appropriate to defer the resolution of local infrastructure matters until future detailed DAs. Additional infrastructure required as a result of the SSDA yields should be quantified as part of the master plan and

no approval should be given for the SSSA until a mechanism has been established between Landcom and Council to address the increased demand for local infrastructure as a result of the additional population.

Water management

- An extension until 23 October 2020 is requested to provide comments on Landcom's water management responses.

Thank you for the opportunity to provide the above comments. If you have any questions in relation to the above, please contact Alicia Jenkins, Strategic Planning Coordinator on 9843 0396.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Nicholas Carlton', with a stylized flourish at the end.

Nicholas Carlton

MANAGER – FORWARD PLANNING