



23 September 2020

Travis Reid, Development Manager
Blue Print Australia
PO Box 5266
SOUTH MELBOURNE VIC 3205

Our Ref: FP223

Dear Mr Reid

21-23 VICTORIA AVENUE, CASTLE HILL

I refer to our meeting on 27 August 2020 where you and the project team presented a revised concept for land at 21-23 Victoria Avenue, Castle Hill. This letter provides some preliminary feedback on the concept, a summary of submission requirements and key matters to be addressed should you wish to proceed to lodgment of a planning proposal.

Planning proposals should be prepared in accordance with the Department of Planning, Industry and Environment's *'A Guide to Preparing Planning Proposals'* and should address consistency with the Central City District Plan and Council's Local Strategic Planning Statement, supporting Strategies as well as compliance with any applicable Ministerial Directions and relevant State Policies.

The application documentation should clearly identify all amendments proposed to The Hills LEP 2019 and The Hills DCP 2012 to facilitate the proposed development outcome. Detailed information to demonstrate intended development outcomes should be provided, including site plans, architectural plans (where appropriate) and photomontages which are sufficient to demonstrate the type and form of development that the proposed amendments to the planning framework would enable.

It is noted that any decision on whether your proposal should progress to Gateway Determination will be made by the elected Council. The following officer level comments on your revised concept are provided in good faith to assist you in the preparation of a formal planning proposal application. They should not be considered as pre-empting the outcome of a formal assessment process.

- **Flooding / Stormwater:**

Further consideration should be given to the location of buildings having regard to the overland flow path that traverses Lot 1 DP 657013. The indicative concept identifies buildings constructed over the overland flow path which is not encouraged. The development should appropriately consider and manage this constraint through water sensitive urban design and must demonstrate that there will be no adverse impact on surrounding properties as a result of redevelopment.

- **Traffic, Transport and Parking Assessment:**

The planned signalisation of the Carrington Road / Victoria Avenue intersection will impact on future development of your site. As you are aware, TfNSW has previously prepared upgrade plans for this intersection, which indicated the potential requirement for a left-turn slip lane into

Carrington Road. If required, this would encroach into the site beyond the extent of SP2 Infrastructure zoning currently indicated under The Hills LEP 2019.

Council is currently in the process of preparing an 80% concept for the Carrington Road upgrade which will include updated designs and modelling for the Carrington Road/Victoria Avenue intersection. A definitive position on the extent of road widening, as a result of this design process, will be available in around November 2020 and will be provided to you as soon as possible.

You have been previously advised that in the view of Council officers, a left-turn slip lane is unlikely to be required at this location. While we remain of this view, preliminary findings from the active design process are not yet definitive. Further, Transport for NSW, who is ultimately responsible for approving any intersection design, may not share this view and may still require a left turn slip lane at this location.

Given the uncertainty with respect to this matter and the ongoing design process underway, it would be prudent for you to consider the design implications on your proposed development and potential alternate outcomes, if additional land for a left-turn slip lane is required by TfNSW.

The 2 vehicular entry and exit points along Victoria Avenue are quite close to the Victoria Avenue/Carrington Road intersection. Confirmation will be required that the multiple vehicular access points along Victoria Avenue will not impact on the operation of the Carrington Road/Victoria Avenue intersection (pre and post upgrade). This matter can be further discussed as the design for the intersection progresses.

- **Pedestrian through site link**

Currently, the Castle Hill Employment Area is characterised by large blocks, limited through site links and relatively poor pedestrian connectivity. Given the large area of your site, a publicly accessible through-site pedestrian link from Victoria Avenue to the eastern boundary of your site will be required. This link should remain in private ownership with a public easement/right of access. As the remainder of the sub-precinct develops, these east-west pedestrian links will ultimately extend between Victoria Avenue and the Cattai Creek Corridor. The need for improved pedestrian connectivity in this location was identified as being required through the State Government led master planning exercise for the Cattai Creek West Precinct.

At our meeting you advised that a pedestrian through-site link would not be appropriate as it would interfere with the operation of the planned service road along the eastern boundary of the site. This position is not supported and alternate options for the design and location of the service road should be explored which facilitate a through-site pedestrian link.

- **Parking**

It is acknowledged that the capacity for the development to incorporate substantial basement parking would be impacted by the rail tunnel and overland flow path which bisect the site. Consideration should be given to an appropriate quantum and location of parking spaces. Any reduced parking provision should be supported by sufficient evidence to justify the quantum provided, including shared parking arrangements between uses, where relevant. Above-ground parking is generally discouraged however where proposed, it should be carefully integrated into the building design and potentially be adaptable with capability for conversion into commercial floor space over time.

- **Residential Development**

The proposal to include residential development (in the form of build-to-rent housing) on the site is discouraged. The Castle Hill Employment Area is strategically significant employment land within the District and provides vital urban support services for our residents and workers. Facilitating the encroachment of sensitive uses, such as residential development, into the core of the employment area would likely result in substantial land use conflict and would be difficult to justify in terms of strategic or site specific merit. It is noted that Council has recently made a submission in response

to the Department's Housing Diversity SEPP Explanation of Intended Effect, which objected to the notion of permitting build-to-rent housing within commercial, business or industrial zones.

- **Density**

Whilst the overall concept of facilitating increased employment densities on the site is reasonable, the proposed FSR of 3.4:1 is potentially excessive at this location, given the site is at the outer edge of the walkable catchment to Showground Station. Under The Hills Corridor Strategy, this portion of the Precinct was identified as accommodating higher density commercial development with a potential FSR of 2.5:1. Removal of the residential component of the development and breaking-up of the built form to improve pedestrian connectivity through the site would likely assist in placing some downward pressure on the overall density being sought through the proposal.

- **Supermarket Floor Space**

Any future proposal to amend the planning controls applicable to the site should be supported by an Economic Impact Assessment which demonstrates that there is sufficient demand for a 3,000m² supermarket at this location, without compromising the ability for other existing and proposed centres to fulfil their respective roles in Council's hierarchy. This would include a justification for the proposed type of retail, the scale and quantum of floor space and identification of the level of existing and projected unmet demand in the locality.

- **Additional Permitted Uses**

The Planning Proposal should clearly articulate the proposed amendments to LEP 2019. Each land use should be clearly listed along with its corresponding land use term and existing permissibility. All uses which would not be permitted within the applicable land use zone should be clearly identified and supported by justification as to how these uses will be consistent with the applicable zone objectives.

- **Local Infrastructure Improvements**

Contributions Plan No. 19 – Showground Precinct (CP19) applies to the site. Contributions would typically be calculated as part of any future development assessment process. The current contribution rate under CP19 is \$126.67 per square metre of new or additional floor space. However, the completion of the 'Cattai Creek West Area' master planning, Cattai Creek Detailed Landscape Master Plan, Regional Traffic Modelling and the Carrington Road upgrade concept, may prompt the need for a review of the Contributions Plan in the future. It is expected that any site-specific planning proposal should contain an assessment of the adequacy of the infrastructure identified within the current Contributions Plan to service the extent of uplift proposed.

- **Information and Lodgement**

A planning proposal for the subject site would need to be submitted with the following information, at a minimum:

- Covering letter and completed Political Disclosure Form and Statement of Business Ethics;
- Completed Planning Proposal Application Form;
- Planning proposal report prepared in accordance with the relevant guidelines;
- Urban Design Assessment;
- Economic Impact Assessment;
- Traffic, Transport and Parking Assessment;
- Infrastructure assessment; and
- Flooding / Stormwater Assessment.

Any planning proposal application should include 1 hard copy of all documentation, as well as electronic copies of all documents on a USB. The lodgement fee for this proposal would be \$69,235.00 (applicable for the 2020/2021 Financial Year).

A copy of Council's Planning Proposal Policy can be viewed at the following location – <https://www.thehills.nsw.gov.au/Council/Documents-Reports-Registers-and-Policies/Policy->

[Register](#) (Policy 22). This Policy provides further information on the planning proposal application process and contains a lodgment.

Council's Planning Proposal Application Form can be downloaded at the following location - https://www.thehills.nsw.gov.au/files/sharedassets/public/ecm-website-documents/page-documents/application-forms/thsc-application_form_planning_proposal_2020.pdf

Should you wish to proceed, it is recommended that you contact Brent Woodhams, Principal Coordinator Forward Planning on [REDACTED]

Yours faithfully

[REDACTED]
Nicholas Carlton
MANAGER – FORWARD PLANNING