



5 August 2022

Chair of the Independent Planning Commission NSW (IPC)
Suite 15.02, Level 15
135 King Street
Sydney NSW 2000

By email: ipcn@ipcn.nsw.gov.au

Attention: Professor Mary O'Kane AC

RE: SSD-15882721: State Significant Development Doran Drive Plaza Precinct

Dear Professor O'Kane,

We refer to the above State Significant Development Application (SSDA) which has been referred to the IPC by the Department of Planning and Environment (DPE) on 20 July 2022 for determination.

The SSDA was placed on public exhibition from 2 August 2021 to 30 August 2021, following which QIC provided a letter of submission dated 30 August 2021. Similarly, QIC also submitted to the related modification of the relevant Concept SSDA (SSD-9653-Mod-1) dated 26 November 2021.

The (then) Department of Planning, Industry and Environment requested the Proponent prepare a response to the issues raised in the submissions to SSD-15882721 in the form of a Response to Submissions Report. With reference to the Proponent's Response to Submissions, QIC provided a subsequent submission to DPE dated 10 June 2022.

Attached overleaf are copies of the letters of submission prepared by QIC dated 30 August 2021 and 10 June 2022, respectively. QIC wishes to reiterate those concerns for the IPC's consideration in the determination of SSD-15882721.

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.

Further to our previous submissions, QIC's existing concerns about the proposal still stand as follows:

- The proposal deviates from the maximum parking rate controls in the Urban Design Guide and therefore fails to demonstrate design excellence;
- The proposal does not deliver Transit-Oriented Development (TOD);
- The car parking benchmarking exercise is not appropriate for the circumstances in question;
- The response documentation prepared by the Proponent does not adequately address the parking concerns raised by QIC;
- The proposed full-line supermarket will result in poor urban design outcomes; and
- The design documentation prepared by the Proponent fails to justify the bulk and scale of the proposed full-line supermarket.

QIC therefore recommends the development be amended to:

- Accommodate reasonable parking provision to demonstrate design excellence and transit-oriented development (TOD); and
- Incorporate a true mixed-use approach to the proposed land use and urban design, instead of a full-line supermarket.

QIC 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. We look forward to the opportunity to create a vibrant town centre in Castle Hill to meet the needs of the existing and future community.

Yours sincerely,

David Tewksbury
Investment Manager

Attachments:

- QIC letter of submission dated 10 June 2022
- QIC letter of submission dated 30 August 2022



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

10 June 2022

Attention: James Groundwater

Dear James,

RE: Further Submission to SSD-15882721: State Significant Development Doran Drive Plaza Precinct

This submission has been prepared on behalf of QIC Limited in relation to the exhibition of SSD-15882721, which seeks consent for the construction of a mixed-use development in the Doran Drive Plaza Precinct. 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 object to the proposed full-line supermarket and subsequent proposal to increase car parking.

The SSDA was placed on public exhibition from 2 August 2021 to 30 August 2021, following which QIC provided a letter of submission dated 30 August 2021. The (then) Department of Planning, Industry and Environment requested the Proponent prepare a response to the issue raised in the submissions in the form of a Response to Submissions Report. The Proponent has since provided a response dated April 2022. QIC requests further consideration of the matters raised in the initial submission letter dated 30 August 2021, which are reiterated with reference to the Proponent's response to submissions.

In summary:

- The proposal deviates from the maximum parking rate controls in the Urban Design Guide and therefore fails to demonstrate design excellence;
- The proposal does not deliver Transit-Oriented Development (TOD);
- The car parking benchmarking exercise is not appropriate for the circumstances in question;
- The response documentation prepared by the Proponent does not adequately address the parking concerns raised by QIC;
- The proposed full-line supermarket will result in poor urban design outcomes; and
- The design documentation prepared by the Proponent fails to justify the bulk and scale of the proposed full-line supermarket.

1. Parking provision

A number of parking-related concerns were raised in QIC's letter of submission dated 30 August 2021. The majority of these concerns appear to be left unaddressed by the Proponent in the Response to Submissions Report.

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.

Secondly, 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. 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.

Thirdly, QIC's initial submission raised the fact that 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.

Appendix 32, which has been prepared by Hill PDA in response to QIC's first submission, does not address the specific traffic and parking matters raised by QIC. Hill PDA has noted that traffic and parking is "outside of their expertise". Furthermore, Appendix 23a includes a traffic response letter prepared by Varga Traffic Planning. This traffic response letter is generic in nature and does not provide specific responses to the matters raised in QIC's submission. Instead, the Proponent has aimed to justify the additional parking provision as a way of "providing additional choice" to the residents that "live outside the walkable catchment". This is an inadequate response to QIC's concerns about the overprovision of parking and fails to consider the fact that these local residents should be prioritising public transport as the primary means of travelling to and from the proposed development.

2. Poor land use and urban design

QIC's initial submission raised the fact that the proposed full-line supermarket will detract from the intended mixed-use vibrant centre whereby the future full line supermarket will dominate as the 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 dominant footprint, the proposed design to accommodate a full-line supermarket will emphasise 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 a widely recognised 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.

The Proponent has not addressed these concerns and fails to justify the proposed bulk and scale which will result in a poor urban design outcome. The Response to Submissions Report prepared by Deicorp report refers to the response prepared by Hill PDA (Appendix 32) to address this matter, however this response reflects that urban design is “outside their expertise”. There is no justification for the proposed bulk and scale of a full line supermarket.

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.

Further to our initial submission dated 30 August 2021, QIC’s existing concerns about the proposal still stand and we recommend the development be amended to:

- Accommodate reasonable parking provision to demonstrate design excellence and transit-oriented development (TOD); and
- Incorporate a true mixed-use approach to the proposed land use and urban design, instead of a full-line supermarket.

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

Yours sincerely

David Tewksbury

Investment Manager



30 August 2021

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

RE: QIC Submission to SSD-15882721 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-15882721, which seeks consent for the construction of a mixed-use development in the Doran Drive Plaza Precinct, which is on public exhibition from 2 August 2021 to 30 August 2021. Overall, QIC supports the construction of a mixed transit-oriented development that promotes the use of the Hills Showground Metro station at 2 Mandala Parade, Castle Hill, however object to the proposed full-line supermarket and subsequent proposal to increase car parking.

QIC is the largest landowner within the Castle Hill strategic centre, owning approximately 18.4 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 have the potential to significantly 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 welcome 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 the Doran Drive Plaza Precinct proposal

The following sets out our comments on the proposed development for Doran Drive Plaza based upon our review of the Environmental Impact Statement and supporting technical reports, along with the Concept DA SSD-9653 documentation.

1.1 Inconsistency with the Concept DA SSD-9653

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:

C6. The rates of car parking and bicycle parking spaces for future development 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	Proposed in SSD-15882721
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.

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 Section 4.55(1A) modification does not result in minimal environmental impact

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.



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.

The EP&A Act provides that for 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.

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).

1.4 Deviates from intended transit-oriented development

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.

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 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 compromise 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

The proposed full-line 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.

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.

1.6 Poor land use and urban design outcome

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 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.

1.7 Traffic and transport impacts

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.

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 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 impacts of COVID-19. The SIDRA analysis should be revised to reflect typical traffic demands more accurately.

Conclusion

The proposed Doran Drive Plaza Precinct SSSA 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 Sydney Northwest Metro line, concern is raised about the proposed full-line supermarket and subsequent increase in carparking.

QIC welcomes the opportunity to comment on the SSSA 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 SSSA are as follows:

- 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 SSSA-9653 approval.
- At a maximum, the proposed development should be limited to a small format supermarket with no increase in parking above the approved SSSA-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 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

