

Draft Central District Plan

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Organisation name: Castle Hill RSL

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First name: David

Last name: O'neil

Suburb: 2060

Submission content: This letter has been prepared on behalf of Castle Hill RSL Club and forms a submission to the draft Central City District Plan. This submission specifically relates to the Castle Hill RSL located within The Hills Shire Local Government Area (LGA). More broadly this submission centres on the representation of integrated aged living within the draft District Plan and the future redevelopment of the Castle Hill RSL. Further to the submission made in March of this year to the original draft District Plan, this letter responds to the revised version of the previous draft West Central District Plan, now known as the Central City District, released for public comment. Please refer to attachment.

Number of attachments: 1



WILLOW TREE PLANNING

ACN: 146 035 707 ABN: 54 146 035 707
Suite 7, Level 7, 100 Walker St,
North Sydney NSW 2060
P 02 9929 6974
enquiries@willowtreeplanning.com.au

Greater Sydney Commission
PO Box 257
Parramatta NSW 2124

Attention: Professor Edward Blakely – Central City District Commissioner

TOWN PLANNING SUBMISSION – DRAFT CENTRAL CITY DISTRICT PLAN

Dear Professor Blakely,

This letter has been prepared on behalf of Castle Hill RSL Club and forms a submission to the draft Central City District Plan. This submission specifically relates to the Castle Hill RSL located within The Hills Shire Local Government Area (LGA). More broadly this submission centres on the representation of integrated aged living within the draft District Plan and the future redevelopment of the Castle Hill RSL. Further to the submission made in March of this year to the original draft District Plan, this letter responds to the revised version of the previous draft West Central District Plan, now known as the Central City District, released for public comment.

The draft Central City District Plan incorporates feedback from the exhibition of the draft District Plans from November 2016 to March 2017. The revised draft District Plans is the Commission's formal response to the key issues raised in the submissions. Of relevance to this submission are the following key issues raised during this exhibition period which have been acknowledged in the revised draft District Plans:

Housing diversity and affordability

- *Support for increased housing diversity and the provision of affordable housing.*
- *Concerns about the adverse impact of high density housing on heritage values, traffic and community infrastructure.*

The following addresses the revised draft District Plan and again outlines recommendations and justifications in order to realise the optimal strategic future of the Site, and within the wider Central City District.

STRATEGIC PLANNING CONTEXT

Whilst Castle Hill was identified as a 'District Centre' within the original draft West Central District Plan, for the purposes of the revised draft Central City District Plan, Castle Hill is now identified as a 'Strategic Centre' (refer to **Figure 1**). The strategic importance is further enhanced through the fact that Castle Hill is *introducing more education, medical and lifestyle opportunities as they become the new higher density subdivisions for the District's rapidly expanding population and job base.*

Castle Hill RSL is one of the largest stand alone registered clubs within The Hills Shire LGA and has approximately 2,500 members over 55 years, 650 members over 70 years and 1,000 students aged 12-17 years. The services of the Castle Hill RSL are integral to the local community, with the Club providing much-needed community facilities to all members of the community. This important role cannot be underestimated and in fact the Club expects it to grow into the future as demand for community facilities and services increases in accordance with population growth and the ageing population. The strategic importance of the

Site also provides the opportunity to increase the land use and density across the Site, in particular, seniors housing.

The proposed future development of the Site has been brought about by the recognition that the Site is considered to be of strategic importance, and provides a great opportunity for the development of an Integrated Aged Living Precinct. The Castle Hill RSL is considered a focal point for the local community, with particular focus on senior’s activities. Further, the proposed development is considered a unique opportunity that will build upon the existing community infrastructure with the integration of a Seniors Living Precinct.

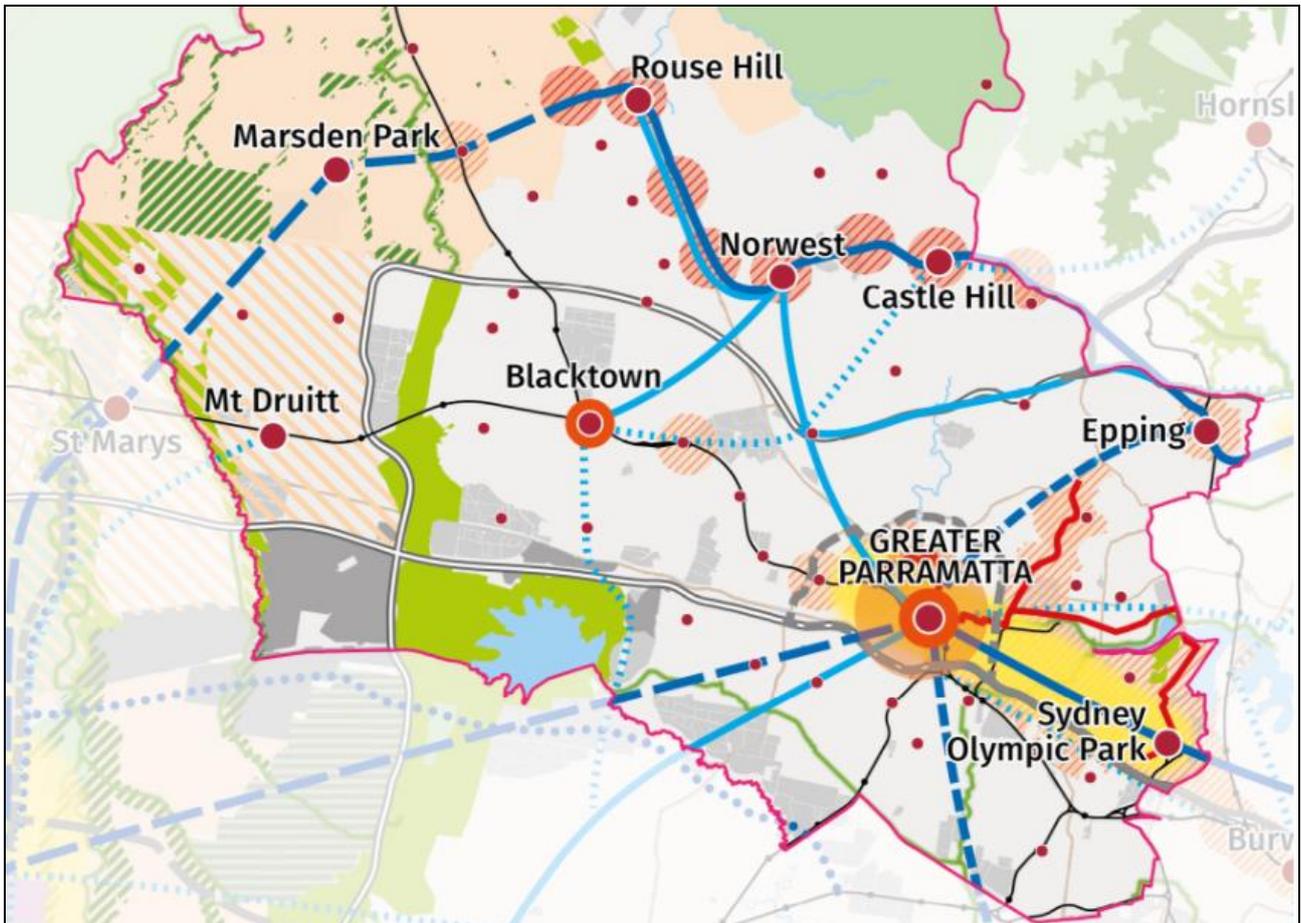


Figure 1 | Central City District

In light of the strategic opportunities perceived with respect to the Castle Hill RSL, a Site Compatibility Certificate was issued by the Department of Planning and Environment. Specifically, the Site Compatibility Certificate (SCC) certifies that the Site is suitable for more intensive development than currently exists and that the proposed seniors living development is *'compatible with the surrounding environment having had regard to the criteria specified in clause 25(5)(b)'* of SEPP HSPD. Key components of the SCC are outlined as follows:

- Site preparation works;
- Construction and operation of seven (7) separate buildings of predominately 5-6 storeys in height for the purposes of:
 - 329 Independent Living Units;
 - 90 Serviced Care Apartments;
 - 90 Residential Aged Care Facilities;
- Basement level car parking accommodating approximately 690 vehicles (in addition to the existing 820 car parking spaces);
- Provision of vehicular access to and from the Site;
- Alterations and additions to the existing Castle Hill RSL and ancillary members services;

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- Inclusion of 1,650m² of ancillary retail space i.e. convenience stores, cafes and restaurants;
- Associated landscaping and public domain improvements; and
- Extension and augmentation of physical infrastructure utilities as required.

The proposed concept plan is outlined below in **Figure 2**.

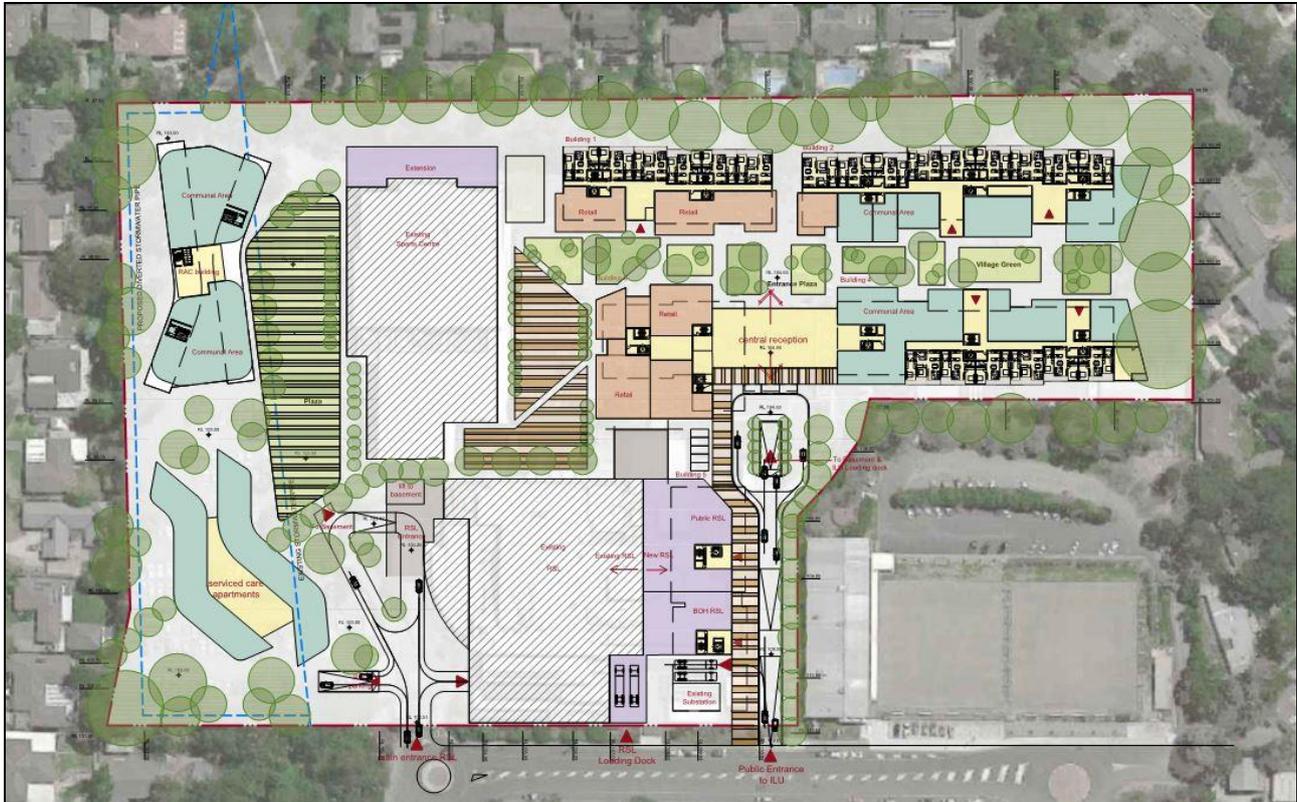


Figure 2 | Proposed Building Footprint of Seniors Living Precinct

The SCC directly responds to the District Plan in terms of employment, housing, services, and seniors living, as described in the following paragraphs.

In order to accommodate the district’s 550,000+ new residents by 2036, adequate supply of suitably developed and strategically located land must be provided. By permitting higher densities across the Site, particularly in the form of Aged Care, approximately 500 additional housing typologies could be delivered, thereby significantly contributing to the targeted delivery of 8,550 new dwellings with The Hills Shire LGA by 2021 and 207,500 new dwellings within the Central City District by 2036. Consistent with the draft District Plan, the proposed development will *deliver housing within a walkable distance of strategic centres, encourage non-vehicle trips, foster healthier communities, and contribute to a sense of vibrancy within centres*. It is also seen to contribute and enhance an existing community hub, building upon the existing infrastructure.

Similarly, the Concept Masterplan submitted as part of the SCC demonstrates that the proposed development can provide a substantial amount of long term new employment opportunities for the greater community such as nursing, administration, catering, cleaning, custodial, maintenance, managerial and landscaping, which will contribute to the projected 16,000-19,500 additional jobs in Castle Hill. In accordance with the District Plan, the proposed development will contribute to the creation of a well-planned precinct that *helps to stimulate economic activity and innovation through the co-location of activities, provides jobs closer to where people live and uses infrastructure more efficiently*.

The District Plan also identifies the need to complement growth with new community services to ensure the creation of a highly amenable and interactive communities. The provision of mixed use development on the site would open up new opportunities for the provision of services and facilities to support the greater

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community through the provision of seniors housing and associated health services, as well as the ongoing provision of community facilities and activities.

The liveability and sustainability priorities of the District Plan require that public open spaces, walking and cycling networks and a more accessible riverfront are provided. The renewal of the existing site would be complemented with public open space and an improved interface between the Castle Hill RSL and adjoining residential developments. Significant opportunity is thereby afforded for the creation of a highly amenable, well designed, more accessible and better connected public realm.

Combined with the provision of employment uses, residential accommodation, community facilities and public open space across the Site, supported by new infrastructure and government public transport initiatives along with Castle Hill being a Strategic Centre, would contribute to the creation of the 30 minute city and reinforce Castle Hill's role in contributing to the greater Metropolitan Region.

Further, to the above, the SCC closely reflects the District Plans' 'expectations for all Strategic Centres', being:

- *High levels of private sector investment;*
- *Flexibility, so that the private sector can choose where and when to invest;*
- *Co-location of a wide mix of activities, including residential;*
- *High levels of amenity and walkability;*
- *Areas identified for commercial uses, and where appropriate, commercial cores.*

Overall, as the District's population grows, major demographic changes are occurring. Planning must recognise the changing composition of population groups in local places and provide services and social infrastructure that meet the changes in people's needs through different stages of life. This requires integrated planning and collaboration. This includes considering both the provision of services and the overall outcomes for the community and intergenerational equity.

SUMMARY AND CONCLUSION

In summary, this submission provides the following recommendations to the draft Central City District Plan:

- The way people age has evolved, where it is no longer relevant that Aged Care facilities desire isolation. More importance is placed on the creation of precincts that create communities that are accessible to the public and provide facilities for residents to maintain an active lifestyle, while promoting social interaction and creating a sense of inclusiveness.
- In recognition of the important role of the Castle Hill RSL in delivering services to the local community in delivering community infrastructure, and providing jobs, the overall Site should be developed for the purposes of seniors housing.
- The Site and wider supply of residential lands within the Central City District comprise of significant land area. They are key to the attainment of housing targets for Greater Sydney and for the Central City strategic and district centres. Given that the State housing targets provide general targets based on housing typology, the District Plan continues to fail to identify housing targets for Seniors Living and therefore underplays the role of Seniors Living in contributing to affordable housing choice for the growing and ageing population. Again, it is recommended that more emphasis is placed on Seniors Living, and targets are established for strategic centres.
- In light of the above, it is recommended that Integrated Seniors Living is considered in further detail within the draft District Plans, in particular its relation and proximity to existing community facilities and infrastructure.
- To accommodate the Districts 550,500 new residents by 2036, an adequate supply of suitably zoned and strategically positioned land must be provided. Through providing high density on the Site, additional housing can be provided thereby significantly contributing to the target delivery of 8,550 new dwellings within the Hills Shire LGA and 202,500 new dwellings for the Central City District.

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- Housing typology will be led by population growth, with particular emphasis placed on the anticipated 122,250 increase in population of people +65 across the Central City District.
- Combined, the provision of employment uses, residential accommodation, community facilities and public open space on the Site in proximity to the Strategic Centre, supported by new infrastructure and government public transport initiatives, would contribute to the creation of a 30 minute city.
- Notwithstanding the above recommendations, the Site should remain subject to merit based assessment, meaning that no restrictive height or FSR standards should be imposed.
- It is recommended that the nomination of areas recognised for Seniors Living be guided by priorities and actions to guide future planning, land use decisions and infrastructure upgrades.
- Overall, the proposed future development of the Site is considered a viable outcome for ensuring the strategic intent of the draft District Plan, and other relevant strategic planning documents, is translated into implementation.

The analysis and review undertaken in support of this submission and here-summarised, demonstrate the strategic opportunities presented by employment lands and centres within the Central City District and Greater Sydney. Therefore, it is requested that the Greater Sydney Commission pursues the recommendations advised in this submission in order to facilitate a viable and sustainable future.

Regards,



Ashleigh Smith

Willowtree Planning Pty Ltd

ACN: 146 035 707