13204
24 April 2013

Alan Moroney
Strategic Assessments
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Alan Moroney

Dear Alan

NORTH WEST RAIL LINK CORRIDOR STRATEGY
ROUSE HILL STRUCTURE PLAN

We refer to the *Draft North West Rail Corridor Strategy* (**draft Strategy**) and *Rouse Hill Draft Structure Plan* (**draft Structure Plan**) which are currently on exhibition. This submission has been prepared on behalf of Lend Lease GPT (Rouse Hill) Pty Ltd (**LLGPT**). We appreciate the Department of Planning & Infrastructure (**DOPI**) taking time to review our submission, and confirm that LLGPT is able to discuss any aspect of it at your request.

1.0 SUMMARY OF THE SUBMISSION

LLGPT supports the intent of the NWRL Corridor Strategy and Rouse Hill Draft Structure Plan. However, LLGPT believes the draft Structure Plan underestimates the potential for Rouse Hill to accommodate significant residential accommodation.

We raise the following issues with the draft Structure Plan:

- It does not acknowledge that Rouse Hill was designed a transit oriented development to support higher density residential development;
- It does not highlight the existing amenity which supports high density residential development;
- It recommends low and low/medium density development within areas with close proximity to Rouse Hill and Cudgegong Road rail stations and Rouse Hill Town Centre;
- It recommends only a small increase in development potential between 2012 and 2036;
- It does not respond to the strategic criteria for a Major Centre – Planned;
- Most other NWRL precincts are provided with greater residential density than Rouse Hill; and
- It does not take into account actual demand for housing between 2012 and 2036.

On the basis of the above, it is requested the draft Structure Plan be revised to accommodate 2,500 to 3,000 additional dwellings (mainly through apartments) in areas within close proximity to Rouse Hill rail station and Rouse Hill Town Centre.

We also suggest DOPI undertake a review of The Hills DCP controls to ensure the density, unit size and parking requirements do not impede apartment construction in relevant NWRL precincts.

2.0 ROUSE HILL STRUCTURE PLAN

Rouse Hill is one of eight new stations proposed along NWRL and is the subject to the Rouse Hill Draft Structure Plan (**draft Structure Plan)**. The Draft Structure Plan presents the opportunities and constraints for new development in Rouse Hill as a result of the new rail station and within the existing physical and environmental constraints. The area subject to the draft Structure Plan is shown at **Figure 1**.

The key conclusions of the draft Structure Plan are:

- Constraints to development include recent development, existing uses (i.e. cemetery and crematorium) and bushfire prone land.
- There are a number of pre-2036 housing opportunities in Rouse Hill (shown at **Figure 2**).
- The areas recently redeveloped within Rouse Hill may provide a longer term opportunity for additional housing in Rouse Hill.
- The current planning controls are likely to deliver 500 additional dwellings and 2,000 additional jobs by 2036 (shown at **Table 1**).
- Recommended increases in development potential will result in the potential for 950 additional dwellings and 3,500 additional jobs by 2036 (shown at **Table 1**).
- The following number of additional dwellings (by dwelling type) are recommended:
  - Single detached – 400 new dwellings;
  - Townhouse – 50 new dwellings;
  - 3-6 storey apartments – 200 new dwellings;
  - 7-12 storey apartments – 300 new dwellings; and

Table 1 – Projected dwelling and job growth (2012-2036)

	Existing (2012)	Potential (2036)	Increase
Current Planning Controls			
Housing	2,000	2,500	500
Jobs	4,000	6,000	2,000
Draft Structure Plan Recommendations			
Housing	2,000	2,950	950
Jobs	4,000	7,500	3,500

Source: *Rouse Hill Draft Structure Plan (DOPI)*

Figure 3 identifies the dwelling density recommended across Rouse Hill. The majority of the areas identified as '2012-2036 Opportunity Sites' (in **Figure 2**) are identified for low or low/medium density dwellings. This includes undeveloped precincts within close proximity to the future Rouse Hill rail station and Rouse Hill Town Centre. Only a small number of precincts within Rouse Hill are identified for medium or medium/high density dwellings.

Figure 1 – Rouse Hill Draft Structure Plan area and key land uses

Source: *Rouse Hill Draft Structure Plan (DOPI)*

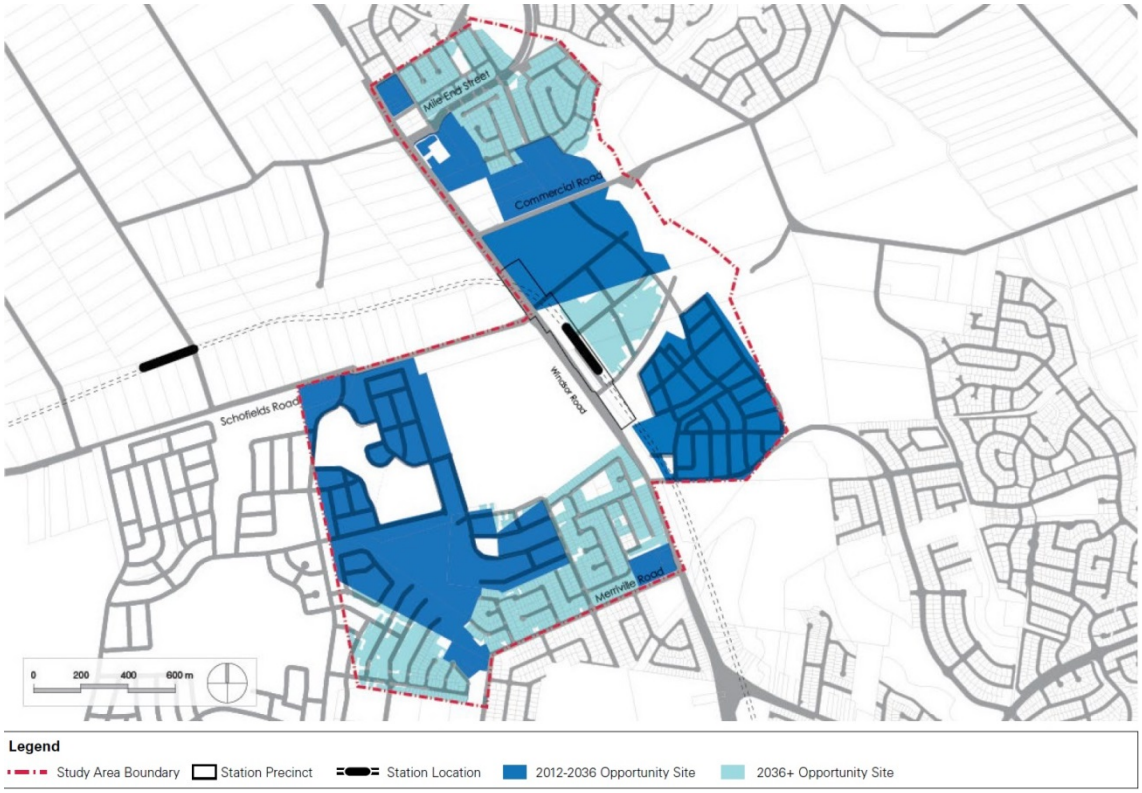

Figure 2 – Opportunity Sites

Source: *Rouse Hill Draft Structure Plan (DOPI)*

Proposed location of low density dwellings

Proposed location of low/medium density living

Proposed location of medium density dwellings

Proposed location of high density dwellings

Figure 3 – Recommended dwelling density distribution

Source: *Rouse Hill Draft Structure Plan (DOPI)*

3.0 DRAFT METROPOLITAN STRATEGY

The draft Metropolitan Strategy for Sydney 2031 identifies Rouse Hill as a Major Centre – Planned. The criteria that Rouse Hill is to achieve by 2031 as a Major Centre include:

- *Key structuring elements for growth in their subregions. They represent significant employment destinations as well as being* ***active mixed-use centres with higher density residential development.***
- *Act as the major shopping, business and service centres for their surrounding area, usually with a full scale shopping mall, council offices,* ***taller office and residential buildings****, central community facilities, a civic square, cinemas, sporting facilities and significant parklands.*
- *In many cases, are the major institutions, principally serving immediate subregional residential populations on the public transport network.*
- *Have a minimum of 8,000 jobs, with the potential for more than 12,000 jobs. Planned Major Centres have* ***the capacity to achieve 8,000 jobs*** *within the timeframe of the Metropolitan Strategy.*
- ***Typically have capacity for around 9,000 to 29,000 dwellings.***
- *Should retain a commercial core where this has demonstrated benefits. Mixed uses should be located around a commercial core and in some centres this may be a significant proportion of the centres.* ***Residential development in the mixed use area can form an important element in revitalising the centre and provide for more housing choice****.*
- *Are divided into established, planned and potential Major Centres.*

LLGPT agrees that Rouse Hill has the capacity to be a Major Centre by 2031. However, the recommended residential yield in the draft Structure Plan does not support the draft Metropolitan Strategy criteria for a Major Centre.

4.0 STRUCTURE PLAN COMPARISON

This section compares the recommended development potential in the Rouse Hill Draft Structure Plan with the development potential recommended in the other NWRL precincts.

4.1 Amenity Comparison

The key amenity attributes of each of the NWRL precincts, particularly the facilities currently in a 1km radius from each station, was compared to identify the relative amenity and attractiveness of each precinct for residential development. The amenity analysis was undertaken using the following methodology:

- formulate relevant assessment criteria (as outlined in **Table 2**);
- review Draft Structure Plans, Draft Metropolitan Strategy and draft North West Subregional Strategy, aerial photography and school location data;
- identify relevant facilities and amenity attributes within relevant boundaries;
- allocate High, Medium, Low or Nil score for each attribute as relevant which give a score of 3, 2, 1 and 0, respectively; and
- identify the cumulative total amenity indicator for each NWRL precinct, with the higher scores indicating better amenity.

Table 2 – NWRL precinct amenity assessment criteria

	Centre Typology	Retail (within 1km)	Local Employment (within the precinct)	Schools (within 1km)	Open Space and Recreation (within 1km)	Bus (within 1km)	Road Network (within 1km)	Total
Nil (0)	No centre	No retail services	No employment	No schools	No open space	No routes	N/A	-
Low (1)	Small Centre	Small group of shops	<1,000 jobs	1 x primary school	Small neighbourhood parks	Local and low frequency	Local roads only	-
Medium (2)	Town Centre	1 x supermarket and specialty stores	1,000 – 8,000 jobs	Primary and secondary school	Local park (passive or active)	Local but high frequency	Access to secondary network	-
High (3)	Major Centre +	Shopping centre, 2+ supermarkets, DDS	+8,000 jobs	More than one primary and secondary school	Mix of passive and active open spaces, indoor recreation	Regional routes	Direct access to regional road	-

Source: *JBA*

The outcomes of the amenity assessment are provided at **Table 3**. Rouse Hill scores very highly by comparison to the other centres along the NWRL. Castle Hill, Bella Vista and Norwest also score highly. These centres require less infrastructure or amenity improvements to facilitate greater residential growth.

Where the precincts score lower, there will be a greater requirement to deliver amenity (i.e. infrastructure) with the new rail station to support new residential development. This puts Rouse Hill (along with the other high scoring precincts) in a better position to support higher density residential development.

Table 3 – NWRL precinct amenity assessment (2013)

	Centre Typology	Retail (within 1km)	Local Employment (within the precinct)	Schools (within 1km)	Open Space and Recreation (within 1km)	Bus (within 1km)	Road Network (within 1km)	Total
Rouse Hill	Medium (2)[1]	High (3)	Medium (2)	High (3)	High (3)	High (3)	High (3)	19
Castle Hill	High (3)	High (3)	Medium (2)	High (3)	Medium (2)	High (3)	High (3)	19
Bella Vista	High (3)	Nil (0)	High (3)	Medium (2)	Medium (2)	High (3)	High (3)	16
Norwest	High (3)	Medium (2)	High (3)	Nil (0)	Low (1)	Low (1)	High (3)	13
Cherrybrook	Low (1)	Low (1)	Medium (2)	Medium (2)	Low (1)	Medium (2)	High (3)	12
Kellyville	Low (1)	Nil (0)	Low (1)	Low (1)	High (3)	High (3)	High (3)	12
Showground	Nil (0)	Nil (0)	Medium (2)	Nil (0)	Medium (2)	Medium (2)	High (3)	9
Cudgegong Rd	Nil (0)	Nil (0)	Nil (0)	Low (1)	Low (1)	Low (1)	Medium (2)	5

Source: *JBA*

4.2 Housing Capacity Comparison

The draft Structure Plan recommends an increase of 950 dwellings in Rouse Hill which will result in a total of 2,950 dwellings by 2036. This represents a relatively low increase by comparison to the other NWRL precincts (shown at **Table 4**).

The resulting dwelling density in Rouse Hill is also significantly lower (9 dwellings/ha) than the other NWRL precincts (majority are 15-16 dwellings/ha). Only Cudgegong Road (8 dwellings/ha) has a similarly low proposed density. Different to Rouse Hill, however, Cudgegong Road has low existing amenity and infrastructure would be required to support the recommended density.

The recommended dwelling density in Rouse Hill does not reflect the existing amenity and attractions in the centre and is significantly less than most centres that require significant amenity/infrastructure provision. If Rouse Hill were to be developed to 15-16 dwellings per hectare (similar to other NWRL precincts) approximately 2,900 – 3,200 additional dwellings would be accommodated between 2012 and 2036.

Table 4 – Existing and recommended housing supply in NWRL precincts

Precinct	Area	2012 Dwellings	Draft Controls (2036)	Increase	Gross Density
Castle Hill	237ha	1,700	6,100	+4,400	26 dw/ha
Norwest	345ha	1,300	5,650	+4,350	16 dw/ha
Showground	271ha	750	4,350	+3,600	16 dw/ha
Cherrybrook	187ha	1,100	2,900	+1,800	16 dw/ha
Kellyville	437ha	2,000	6,400	+4,400	15 dw/ha
Bella Vista	472ha	1,800	6,200	+4,400	13 dw/ha
Rouse Hill	327ha	2,000	2,950	+950	9 dw/ha
Cudgegong Road	474ha	200	3,700	+3,500	8 dw/ha

Source: *North West Rail Link Corridor Strategy (DOPI)*

[1] Rouse Hill is identified as a Major Centre - Planned in the draft Metropolitan Strategy.

4.3 Dwelling Mix Comparison

Table 5 identifies the recommended dwelling mix by 2036 within the NWRL precincts. Rouse Hill is proposed to have a very high proportion of dwelling houses (i.e. 75% of all dwellings) and a low proportion of apartments (23%). By comparison, other NWRL precincts have up to 88% of housing in apartments and all precincts have less than 50% of dwellings as houses.

Table 5 – Proposed dwelling mix of all dwellings by 2036

Precinct	Single Detached	Townhouse	3-6 Storey Apartments	7-12 Storey Apartments
Showground	9%	8%	60%	23%
Castle Hill	10%	2%	36%	52%
Kellyville	19%	16%	48%	17%
Norwest	21%	21%	51%	7%
Cherrybrook	26%	14%	60%	0%
Bella Vista	32%	16%	29%	23%
Cudgegong Road	46%	27%	27%	0%
Rouse Hill	75%	2%	13%	10%

Source: *North West Rail Link Corridor Strategy (DOPI)*

The recommended dwelling mix does not reflect the amenity available in Rouse Hill, particularly by comparison to the other NWRL precincts. Even Cudgegong Road, which has very low existing amenity, provides a significantly larger proportion of medium density housing with 27% of dwellings as townhouses and 27% of dwellings as apartments.

Rouse Hill will have the largest number of single detached houses of all NWRL precincts (2,200 houses) which reflects an increase of 400 houses between 2012 and 2036 (shown at **Table 6**). There is a constraint to redeveloping recently built dwellings (which is the case amongst many in Rouse Hill) but this should not dictate the new housing form in other areas of Rouse Hill, particularly the existing undeveloped land directly adjacent to the town centre.

Rouse Hill will also have the fewest number of apartments (700 dwellings) and townhouses (50 dwellings) by 2036. This is significantly less than all other precincts and does not reflect a mix that will facilitate a diverse community benefiting from the high amenity in Rouse Hill.

Table 6 – Total dwellings by 2036 (by dwelling type)

Precinct	Proposed Dwelling Mix (by 2036)			
	Single Detached	Townhouse	3-6 Storey Apartments	7-12 Storey Apartments
Castle Hill	600	100	2,200	3,200
Kellyville	1,200	1,000	3,100	1,100
Showground	400	350	2,600	1,000
Norwest	1,200	1,200	2,900	350
Bella Vista	2,000	1,000	1,800	1,400
Cherrybrook	750	400	1,750	0
Cudgegong Road	1,700	1,000	1,000	0
Rouse Hill	2,200	50	400	300

Source: *North West Rail Link Corridor Strategy (DOPI)*

4.4 Dwelling Demand

The draft Structure Plan identifies the demand for only 40 dwellings per annum in Rouse Hill between 2012 and 2036 (i.e 960 dwellings). This is significantly smaller than any other NWRL precinct (as shown at **Table 7**). The majority of precincts are stated to have demand for between 160-200 dwellings p.a.

JBA understands the demand analysis did not take into account the actual number of dwellings that could be taken up by the future residential market in Rouse Hill. The approach adopted in the draft Structure Plan assumes that demand will be limited what is available on the market and therefore underestimates the number of dwellings that may be taken up if made available to buyers. As a result, the demand analysis inappropriately constrains development capacity to 40 dwellings p.a. (or 960 dwellings between 2012 and 2036).

Table 7 identifies the demand for dwellings by type (i.e. single detached, townhouse, low-medium rise apartments and high rise apartments). The demand analysis indicates there is demand for 18 apartments p.a. in Rouse Hill. This is significantly smaller than all other rail station precincts along NWRL and, as it has not been informed by a thorough demand analysis, is likely to greatly underestimate future apartment demand in Rouse Hill.

Table 7 – New dwelling demand analysis (2012-2036)

Precinct	Housing Demand	Proposed Dwelling Mix (New Dwelling Supply)			
	No. of Dwellings (p.a.)	Single Detached	Townhouse	3-6 Storey Apartments	7-12 Storey Apartments
Castle Hill	200	0 (0%)	4 (2%)	60 (30%)	136 (68%)
Kellyville	200	0 (0%)	36 (18%)	120 (60%)	44 (22%)
Norwest	200	10 (5%)	50 (25%)	124 (62%)	16 (8%)
Bella Vista	200	8 (4%)	46 (23%)	82 (41%)	64 (32%)
Showground	165	0 (0%)	17 (10%)	107 (65%)	41 (25%)
Cudgegong Road	160	68 (43%)	46 (29%)	46 (29%)	0 (0%)
Cherrybrook	80	0 (0%)	15 (19%)	65 (81%)	0 (0%)
Rouse Hill[2]	40	17 (42%)	2 (5%)	5 (12%)	13 (32%)

Source: *North West Rail Link Corridor Strategy Structure Plans (DOPI)*

[2] The Rouse Hill Draft Structure Plan dwelling mix demand analysis for Rouse Hill only adds up to 91%.

4.5 Conclusion

Rouse Hill is a high amenity precinct along the NWRL. It was designed as a transit oriented development with amenity and infrastructure that can support dense residential development.

The Rouse Hill Draft Structure Plan underestimates the potential for Rouse Hill to accommodate additional residential development to support and benefit from the future NWRL. The draft Structure Plan recommends the following:

- An increase of only 950 dwellings in Rouse Hill by 2036;
- A gross density of only 9 dwellings per hectare, similar only to Cudgegong Road which has significantly less amenity and infrastructure;
- A total dwelling mix that favours single detached houses (75%) while all other precincts have less than half of 2036 dwellings provided as detached houses;
- Only 550 new apartments or townhouses are recommended in Rouse Hill which is significantly less than that proposed in all other NWRL precincts (from 2,000 in Cudgegong Road up to 4,500 in Castle Hill); and
- There is only demand for 40 dwellings p.a. in Rouse Hill including only 17 apartments p.a. which is significantly less than all other NWRL precincts and has not been informed by thorough demand analysis.

Figure 4 is an illustrative representation of the amenity attributes (as determined at **Table 3**) and recommended dwelling yield with Rouse to the other NWRL precincts (shown at **Table 4**). The chart demonstrates that Rouse Hill has the equal highest amenity NWRL precincts yet is only recommended for a relatively small dwelling yield.

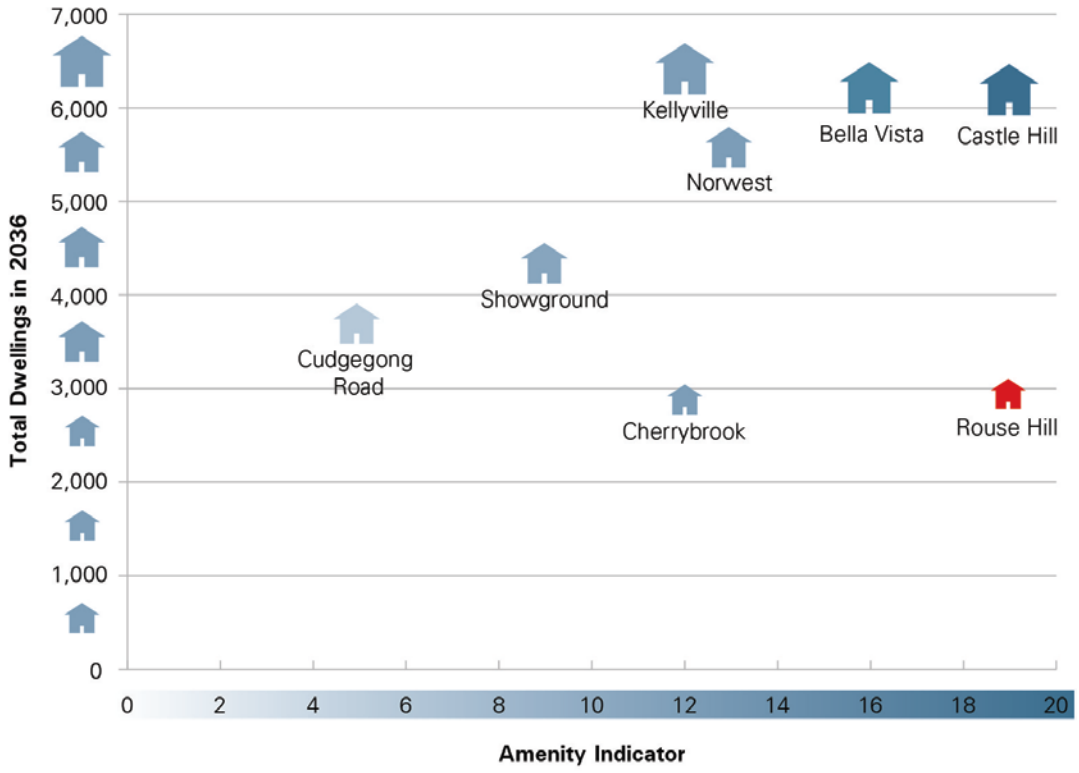

Figure 4 – Amenity and dwelling yield comparison

Source: *JBA*

5.0 DCP REVIEW

The existing density, apartment size and car parking controls in The Hills DCP are provided in **Table 8**. The controls relating to car parking and density are specific to Rouse Hill while the apartment size controls apply across The Hills LGA. The Draft Structure Plan acknowledges *"that parking requirements and minimum apartment sizes are restricting the supply of a variety of apartments"* (page 21).

We agree that the density, car parking and unit size DCP controls restrict the supply of apartments and do not reflect the future context of Rouse Hill as a precinct within walking distance of a railway station. The next steps in implementing the draft Structure Plan should include revisions to the DCP controls to:

- *Increase residential density* - to accommodate more housing opportunities within the Rouse Hill precinct and respond to the residential yield as recommended in the final Structure Plan (taking into account our suggestions at Section 6.0).
- *Decrease unit sizes* – to respond to the changing buyer groups who will be attracted to Rouse Hill due to the improved public transport facilities. Smaller unit sizes will also be more consistent with the minimum standards to contribute to housing affordability identified in the Residential Flat Design Code. More smaller households (single and couples) and particularly young professionals will be more attracted to Rouse Hill with the implementation of the rail station and these buyers will be price constrained and likely to demand smaller units.
- *Decrease parking* – to reflect the improved accessibility of Rouse Hill which will no longer rely heavily on the road network to transport local residents. The future parking rates should be similar to those required in other centres across Sydney with similar access to public transport.

Table 8 – Key planning controls – DCP 2012

Control	Details
Density	– East of Caddies Creek: 15-30 dwellings/ha – South of retail core: 27-60 dwellings/ha – North residential: 30-60 dwellings/ha – Core: >40 dwellings/ha
Unit Layout and Design	Minimum internal floor areas for each unit are: – 1 bedroom unit: 75m^2 – 2 bedroom unit: 110m^2 – 3 bedroom unit: 135m^2
Parking	– 1 bedroom unit: 1 car space – 2 bedroom unit: 2 car spaces – 3 bedroom unit: 2 car spaces – 2 visitor car spaces per 5 units

Source: *DCP 2012*

6.0 SUGGESTED ALTERNATE APPROACH

We suggest an alternative approach which would encourage greater residential density in the Rouse Hill rail station catchment. Our approach suggests an increase of residential capacity in the areas identified at **Figure 5**, particularly the undeveloped land within 400-500m easy walking distance to the station and town centre. These areas are currently undeveloped and are capable of accommodating new medium or high density development. The increased density should aim to accommodate 2,500 and 3,000 additional apartments or townhouses (i.e. total capacity of approximately 5,000 dwellings).

The suggested approach would provide the following benefits:

- The increased yield will provide more residential opportunities within the rail station catchment;
- The increased population will benefit from the high amenity already available in Rouse Hill;
- The increased population will better utilise the NSW Government infrastructure at Rouse Hill rail station and the T-way;
- The larger future population will increase demand for retail which will encourage Rouse Hill Town Centre to expand further and provide greater services for the broader catchment;
- The additional housing will improve dwelling mix and provide smaller, more affordable housing;
- The additional housing will achieve a gross dwelling density similar to the other NWRL precincts (i.e. 15-16 dwellings/ha);
- The dwelling mix and yield is more likely to respond to housing demand; and
- The increased residential yield will contribute to the draft Metropolitan Strategy criteria for residential development within a Major Centre.

JBA and LLGPT would be happy to liaise with DOPI further regarding more specific locations and form of medium and high density development in Rouse Hill. This work should be undertaken prior to the finalisation of the Rouse Hill Structure Plan and incorporate a thorough demand analysis. The demand analysis should be revised to incorporate actual demand by housing buyers, and future supply adapted to respond to demand.

We also suggest DOPI undertake a review of The Hills DCP controls to ensure the density, unit size and parking requirements do not impede apartment construction in all NWRL precincts.

Figure 5 – Alternative approach

Source: *JBA*

7.0 CONCLUSION

LLGPT and JBA support the intent of the NWRL Corridor Strategy and Rouse Hill Draft Structure Plan. However, the recommended residential yield for Rouse Hill dramatically underestimates the potential for the Planned Major Centre to accommodate greater residential density.

There are a number of areas within Rouse Hill that could accommodate higher density residential development, particularly areas within close proximity to public transport and the Rouse Hill Town Centre. Further work is required to better understand what form the higher density should take, however, it is estimated an increased yield of approximately 2,500 to 3,000 additional dwellings could be supported.

Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 6962 or lnoble@jbaplanning.com.au.

Yours faithfully

Lindsey Noble
Property Economist and Strategic Planner