



30 April 2013

AKB\08-001V

Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Via email: plan_comment@planning.nsw.gov.au

Attention: Alan Moroney, Strategic Assessments

Dear Mr Moroney

re: North West Rail Link Corridor Strategy

We write with reference to the North West Rail Link Corridor Strategy ("the Strategy") and the Rouse Hill Station draft Structure Plan ("the draft Structure Plan"), which are currently on exhibition for public comment.

This submission is made on behalf of The GPT Group (GPT), in its capacity as owners and managers of the Rouse Hill Town Centre (RHTC), including the land to the north of the existing RHTC which is subject to a current suite of applications lodged by GPT to facilitate a major mixed use development.

A separate submission has been submitted by Lend Lease GPT (Rouse Hill) Pty Ltd in relation to broader issues impacting the Rouse Hill Regional Centre (RHRC, also referred to as "The New Rouse Hill"). GPT endorses the separate submission and wishes to raise some additional matters for consideration specific to the RHTC.

1 BACKGROUND

1.1 GPT and the Rouse Hill Town Centre

Rouse Hill Now

GPT is proud to be a long-term project partner with Lend Lease, Landcom and the NSW Office of Strategic Lands, tasked with the delivery of the RHRC, which has been designated the Major Centre for the North West sector of Sydney.

The Rouse Hill Regional Centre facts:

- 120ha mixed use community is being delivered by Lend Lease and GPT in partnership with Landcom and the NSW Office of Strategic Lands;

- It is located approximately 35 kms north-west of Sydney CBD;
- It will include up to 1,800 homes and include a population of over 4,500 people;
- Key infrastructure has been delivered up front: Rouse Hill Town Centre, schools, community facilities, open space, transport and road infrastructure, including a major upgrade of Windsor Road and Commercial Road which have been provided ahead of demand;
- Emphasis is placed on the quality of urban form, with unified streetscapes, advanced street tree planting and homes designed to address public spaces;
- A walkable community - each home is located within a three minute walk of an open space; and
- RHTC will incorporate an integrated transit square, designed and approved in the Town Centre Core Precinct Plan (TCCPP).

To date, GPT has delivered the following:

- \$470 million of greenfield development;
- 63,600 square metres of retail space;
- 2,800 square metres of office space;
- 3,000 square metres of community space; and
- A range of public spaces including Town Square, Market Square, Food Terrace, Backyard and the Secret Garden.

The RHTC has an annual sales turnover of more than \$374 million, accommodates 200 retailers, provides employment for over 3,000 people, created 104 residential dwellings and has been embraced by Rouse Hill residents as the living heart of their community with 10 million visitors per year. GPT and its partners have put the customer and their needs at the central focus of this development.

Today, ten years after the NSW Government first awarded the tenders to GPT and its Project Partners, RHTC is a vibrant, mixed-use town centre that provides a focal point for the local community and surrounding suburbs. The mix of signature architecture, attractive retail choices and active spaces has created an authentic and contemporary Australian town and activity centre.

RHTC has won numerous national and international awards for its urban design and public domain. The public realm of the town centre is critical to its sense of 'civic' place. Streets and pedestrian ways are public and active. Public spaces, including Market Square, Town Square, Food Terrace, Backyard and Secret Garden have been embraced by the community as they are places where they can meet and engage in the town centre environment. GPT's

intention is for the future transit square to be similarly integrated into the RHTC, as described in the TCCPP.

Rouse Hill Future

The RHRC is subject to a staged consent process under the former Section 80(4) of the *Environmental Planning and Assessment Act 1979*. The approved 2004 Masterplan is a 'Level 1 Consent', each Precinct Plan (including the 2005 Town Centre Core Precinct Plan) is a 'Level 2 Consent' and consents for building works and subdivision are issued as 'Level 3 Consents'.

The Level 1 and Level 2 consents provide for the development of "Sleeve Buildings" throughout the Town Centre to wrap large format uses and service areas in order to mitigate the visual presence of such uses to streets. The Sleeve Buildings were designated to be a mix of fine-grain retail, commercial, community and residential uses and several are in close proximity to the rail corridor. The Level 1 and 2 consents also allowed for the development of a community / commercial building on 'transit square' (currently known as Market Square), which is intended to integrate with the then-planned underground railway station.

In addition to these future development sites within the Town Centre Core, the GPT Group in conjunction with its project partners lodged a Level 2 Precinct Plan DA in September 2012 for the Northern Precinct of Rouse Hill with The Hills Shire Council (THSC). The Northern Precinct is between Commercial Road and the existing Town Centre and shares an interface with the NWRL. The development of the Northern Precinct for a wide range of retail, office and residential uses was approved by the Level 1 Consent.

Rouse Hill and North West Rail

The NWRL and the delivery of the public realm linking the proposed Rouse Hill station to the existing RHTC and Northern Precinct presents a unique opportunity to create world's best practice in the integration of heavy rail within an Australian town centre.

The vision for the RHTC, as outlined in the Level 2 TCCPP consent, describes the transit corridor as being the 'front door' to the centre. Visitors should experience an enhanced pedestrian walking environment that is well designed, cohesive, welcoming and rich in amenity. The transit centre should provide a seamless customer experience as passengers transition from the station turnstiles, across the public realm and in and around the Town Centre precinct.

GPT shares TfNSW's aspirations for the North West Rail Link stations to integrate with and strengthen the character of the local area. With previous experience on other transport integration projects such as Melbourne Central, GPT understands the importance of collaboration with NWRL and the NSW Government. The aim being to efficiently and seamlessly deliver, operate and manage the public realm, linking Rouse Hill station to the wider community amenity.

1.2 The Strategy and Draft Structure Plan

The currently exhibited North West Rail Link Corridor Strategy aims to coordinate and plan for growth along the corridor of the North West Rail Link (NWRL). The Strategy purports to be:

“a guide for future development around the eight new stations of the North West Rail Link. It provides a vision for how the areas surrounding the train stations could be developed to integrate these new homes and jobs. The corridor strategy includes a draft structure plan for each of the eight new train station precincts.”

One of the new station precincts is Rouse Hill Station, which is located within the masterplanned RHRC site.

The draft structure plans aim to coordinate development across three LGAs, and to:

“look at the current constraints, controls, opportunities and predicted growth, and present a vision for each area for the next 20-25 years.”

The Strategy seeks to ensure that:

“current lifestyles are maintained and improved, while allowing for well-planned future growth. The corridor strategy will guide development to ensure sustainable, well-connected communities, close to jobs, transport and facilities.”

The Rouse Hill Station draft Structure Plan provides a:

“Vision for Rouse Hill Station surrounds”.

After assessing the current physical and statutory constraints, the draft Structure Plan sets out projected growth in housing and employment in the study area, and identifies opportunity sites and approaches to cater for increased growth.

The draft Structure Plan is a strategic plan which will require a review of local zoning and development controls to implement, along with changes to strategy and policy at a local and possibly state government level.

2 SUBMISSION

2.1 Outline of Submission

GPT's submission raises the following matters:

- Support for Strategic Approach
- Need to Recognise Existing RHRC Planning Framework
- Need to Consider Planning Issues in Adjoining Precincts
- Lack of Detail Around Growth Forecasts
- Lack of Detail Around Rail Corridor and Railway Station
- Need to Review RHTC Zoning
- Need to Review RHTC Height Limits
- Need to Review Controls which Inhibit Higher Residential Densities
- Need to review Car Parking Provision
- Concern about Commuter Car Parking
- Detailed Comments and Queries
- Further Action

2.2 Support for Strategic Approach

The NWRL provides an immense opportunity for Sydney's North West. GPT strongly supports the preparation of strategies, and the undertaking of structure planning around each station precinct, in order to make the most of the opportunities afforded by this major infrastructure investment.

The exhibited documentation is considered to be an excellent first step to stimulate discussion and debate. GPT looks forward to continuing to work with key stakeholders, including The Hills Shire Council (THSC).

2.3 Need to Recognise Existing RHRC Planning Framework

As outlined in Section 1.1 of this letter, the RHRC has been subject to decades of planning. Successive Metropolitan and subregional strategies have nominated Rouse Hill as a planned Major Centre, oriented around a rail and bus transport interchange. Over the last 10 years, a series of development consents have been obtained to bring the long terms plans to fruition, including the Masterplan consent and the Town Centre Core Precinct Plan (TCCPP) consent described in Section 1.1.

In addition to the above consents, a suite of concurrent applications are currently under assessment by The Hills Shire Council (THSC) to achieve the Masterplan objectives for the Northern Precinct of the RHTC, as follows:

1. *Northern Precinct and Interface Area Precinct Plan DA no. 354/2013/HB*

The purpose of the Precinct Plan DA is to obtain consent for the envisaged ultimate land uses and built form within the Northern Precinct and Interface Area so that future detailed (Level 3) DAs may be lodged and approved. The proposal for the Northern Precinct and Interface Area is detailed in the drawings submitted for consent and is accompanied by Built Form Guidelines.

2. *Section 96(2) application to modify the Masterplan consent no. 1604/2008/HB/A*

The Section 96(2) application seeks to ensure that the Masterplan is modified so that it reflects the form of development now proposed in the Precinct Plan DA. Amendments to the approved Masterplan drawings and additions to the existing urban design principles are proposed so that the Northern Precinct and Interface Area can better achieve the vision of the Masterplan.

3. *Planning Proposal No. 1*

Planning Proposal No. 1 seeks to alter the zoning of the site from B4 Mixed Use to B3 Commercial Core in relation to the Town Centre Core Precinct and the Central District within the Northern Precinct and Interface Area so that the RHRC Town Centre Precincts are recognised in the highest-order commercial zoning available in a non-metropolitan setting. The Northern District and Western District within the Northern Precinct are proposed to remain in the B4 Mixed Use Zone.

4. *Planning Proposal No. 2*

Planning Proposal No. 2 seeks to alter the permissible uses and development standards applying to the land to restore the flexibility, and investment certainty, that previously existed through Baulkham Hills LEP 2005, including deletion of height limits.

5. *The Hills DCP Amendment*

Requested amendments to The Hills DCP 2012, Part D, Section 6 seek to facilitate consideration and assessment of the Level 2 Precinct Plan DA for the Northern Precinct. Changes sought include reduction of minimum apartment sizes and reduced car parking provision.

In our view, the draft Structure Plan does not adequately recognise the significant and best practice planning and urban design work which has already occurred across the RHRC site, nor does it recognise the implications for existing approvals. Rather, the draft Structure Plan appears to suggest that the existing planning framework does not adequately cater for the NWRL.

Further, whilst we agree that some further intensification is warranted, GPT requests that the Structure Plan recognises, reiterates and supports the existing approval framework and recently lodged planning applications, referred to above.

The project partners have incurred significant expense in preparing applications for changes to planning controls to return development potential eroded by The Hills Shire's standard instrument LEP. Development applications and planning proposals are currently being considered by Council, and proposing a further raft of changes is likely to impede, not facilitate, further development. However, current Development Control Plan provisions relating to minimum apartment floorspaces and policies relating to car parking ought be amended to allow the production of product which is better suited to the current market and which reflects the improved accessibility which will come with the delivery of the NWRL.

2.4 Need to Consider Planning Issues in Adjoining Precincts

GPT wishes to ensure that planning for the Rouse Hill Station precinct is effectively integrated with adjoining precincts. Our comments in this regard are as follows:

- The eastern part of the “Cudgegong Road” precinct needs to be planned in an integrated fashion with the Rouse Hill precinct. It is likely that residents in the eastern part of the Cudgegong Road precinct will favour Rouse Hill station due to the proximity, topography and services offered at Rouse Hill.
- Pedestrian access across Windsor Road from the Cudgegong Road precinct is an issue which should be addressed in the Structure Plan, and which highlights the need for integrated cross-precinct planning.
- The Structure Plan should consider issues of access to Box Hill, a planned Town Centre to the north. The extension of Green Hills Drive to connect Rouse Hill with Box Hill is a key strategic link located within the Rouse Hill Station precinct.

2.5 Lack of Detail Around Growth Forecasts

In the absence of further detail around the assumptions and calculations underpinning Section 5.4 of the draft Structure Plan (Projected Growth), it is difficult to understand the veracity or accuracy of the information provided. We would like to review more detail to determine how the draft Structure Plan has ascertained the development capacity of the Rouse Hill Station precinct in terms of dwelling numbers and jobs.

We further note that a separate submission made on behalf of Lend Lease GPT (Rouse Hill) Pty Ltd puts forward an alternate approach to encourage greater residential densities across The New Rouse Hill (RHRC).

2.6 Lack of Detail Around Rail Corridor and Railway Station

Despite comprising “a vision for Rouse Hill Station Surrounds”, the draft Structure Plan provides limited information about the future use or design of development on rail corridor land, except to say that retail and residential uses are envisaged, in addition to transport infrastructure.

This is a significant concern for GPT. The integration of the railway station and bus interchange with the RHTC is a key element of the TCCPP, and a major theme in discussions between GPT and Transport for NSW during the planning and design phase of the NWRL. GPT would welcome the opportunity to discuss land use and urban design issues in greater detail, to ensure that planning for the rail corridor land is effectively integrated with the existing and pending approvals for the RHTC.

2.7 Need to Review RHTC Zoning

Pursuant to The Hills LEP 2012, land earmarked for commercial use at the RHRC is zoned B4 Mixed Use. Over the past two years, GPT has made representations to THSC and the Department of Planning and Infrastructure to the effect that the core retail/commercial RHTC should be zoned B3 Commercial Core, to more accurately reflect the Major Centre designation, with a support area of B4 Mixed Use land to the north.

To this end, THSC currently has before it a request to prepare a Planning Proposal, submitted by GPT, which proposes to rezone part of the existing B4 zoned land to B3. It is necessary that shop top housing be made permissible in Rouse Hill, and it is noted that many LEPs are being made which permit shop top housing in the B3 Commercial Core.

We would be pleased to provide further information about the detail of, and justification for, the proposed zoning. An updated information package is currently being compiled.

GPT requests that the Structure Plan reflect the need to appropriately zone the RHTC to reflect its prominent place in the Centres hierarchy as a Major Centre.

2.8 Need to Review RHTC Height Limits

The Hills LEP 2012 introduced height limits to the RHRC site where there were previously none. In the TCC, the new height limit is inconsistent with existing approvals, and in the Northern Precinct, the heights do not facilitate development of a density to achieve Masterplan objectives. As such, GPT has submitted a second Planning Proposal request to THSC asking that the height limits be removed.

GPT requests that the Structure Plan support the application of flexibility in relation to height, resisting arbitrarily low height limits.

2.9 Need to Review Controls which Inhibit Higher Residential Densities

GPT supports increased dwelling numbers within walking distance of the new railway station. In the case of RHTC, increased densities and greater housing diversity could be simply achieved through making changes in a number of key areas:

- reduction in minimum apartment sizes;
- support for small lot housing; and
- flexible height provisions.

In each of these areas, THSC's planning controls are restrictive, and recent attempts by Lend Lease GPT (Rouse Hill) Pty Ltd to bring about change have not been fully endorsed. The current suite of applications lodged by GPT seeks changes to each of these key controls.

GPT requests that the Structure Plan support the application of flexibility in relation to apartment sizes and residential allotment sizes, resisting arbitrary limits which do not reflect the opportunities afforded by the NWL. GPT would welcome the opportunity to discuss these concerns in further detail with relevant agencies and stakeholders.

2.10 Need to review Car Parking Provision

GPT supports the reduced provision of car parking spaces due in this accessible location. THSC's planning controls require a car parking provision well in excess of RMS Guidelines. Attempts to argue for reduced resident car parking rates have had mixed success.

As with the above issues in relation to residential densities, GPT requests that the Structure Plan support the application of flexibility in relation to car parking provision. GPT would welcome the opportunity to discuss these concerns in further detail with relevant agencies and stakeholders.

2.11 Concern about Commuter Car Parking

The draft Structure Plan refers to the accommodation of commuter car parking associated with a new rail station at Rouse Hill (Section 5.2). GPT is concerned that this draft proposal is inconsistent with the previous accepted approach to avoid the provision of commuter car parking at key activity centre locations. GPT therefore requests that any proposal to now introduce commuter car parking in the vicinity of Rouse Hill station be cautiously considered, and the subject of consultation with GPT.

2.12 Detailed Comments and Queries

Attachment 1 to this letter provides several pages of detailed comments and queries in relation to the draft Structure Plan. These comments form part of GPT's submission.

2.13 Further Action

We appreciate that the release of the Strategy is an important first step in a lengthy process. As a discussion paper, it provides a useful template to move forward.

GPT would welcome the opportunity for engagement with the Department of Infrastructure and Planning, in concert with other key stakeholders including THSC.

GPT would also welcome the opportunity to provide further detail around some of the key issues raised in this submission, particularly in relation to the zoning and development control amendments sought, and the implications for increased residential densities and investment certainty in the Rouse Hill Station precinct.



We thank you for the opportunity to make this submission, and invite you to contact the undersigned if further clarification is required

Yours sincerely
BBC Consulting Planners

A handwritten signature in blue ink, appearing to read 'Alison Brown', with a long, sweeping horizontal line extending to the right.

Alison Brown
Associate Director
Email alison.brown@bbcplanners.com.au



Attachment 1:

Further Detailed Commentary

Detailed comments:

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- General: The overall Rouse Hill development could be referred to as “The New Rouse Hill”. The predominantly retail and commercial retail Precinct should be named “Rouse Hill Town Centre”.
- References to Landcom should be amended to read UrbanGrowth NSW.
- A masterplan development consent exists and has substantial commencement and thus is the controlling instrument across the whole of The New Rouse Hill. This prevails over any subsequent LEP and should be referenced as the prevailing control in respect particularly of building heights.
- Rouse Hill Town Centre Northern Precinct. A series of applications have been made by entities associated with GPT for changes to planning controls over the Northern Frame (i.e. the currently vacant land between Commercial Road and Rouse Hill Drive). These should be acknowledged within the Structure Plan.
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- P 5, para 1: Rouse Hill is not a shopping complex, it is a Town Centre, developed with a mix of community, retail, commercial and residential uses and has been planned to accommodate substantial further mixed use development.
- P 5, para 2: amend wording to reflect that over more than two decades planning HAS BEEN CARRIED OUT and is being implemented by the project partners to deliver a mixed use transit oriented development. From the current text one could infer that the planning of the Minister administering the Environmental Planning and Assessment Act (the land owner) and UrbanGrowth NSW (one of the development partners) to date has been on some basis which is at odds with good practice.
- P 8, para 1: reference to Old Windsor Road ought be to Windsor Road.
- P 8, fig. 5: parts of the northern end of The Ponds and the majority of the New Rouse Hill development are accessible to the station location within ten minutes walk and ought be coloured red/orange/yellow.
- The eastern Precinct of the New Rouse Hill Development is not shown on the figure (i.e. the subdivisions to the east of Caddies Creek). Detail is available from Lend Lease GPT (Rouse Hill) Pty Ltd.
- Open space is shown very inconsistently across the figure. For instance, the extensive Second Ponds Creek corridor through The Ponds, including the active open space off The Ponds Boulevard (Jonas Bradley Park) is not shown; the district open space on the western side of Caddies Creek within the New Rouse Hill is not shown; conservation areas are shown as open space; CPW within The Ponds is not shown; the extensive District Open Space proposed by Council within the Caddies Creek Corridor to the south of the New Rouse Hill is not shown; etc.
- P 8, fig 6: the cadastral bounds of subdivided lands in the north of The Ponds and across the New Rouse Hill should be shown on a consistent basis with other areas.
- The eastern Precinct of the New Rouse Hill Development is not shown on the figure (i.e. the subdivisions to the east of Caddies Creek).

Open space is shown very inconsistently. Refer comments above.

P 9, para 1: why does this paragraph refer to the future of open space areas outside the study area and imply that Council does not have existing open space strategies (i.e. “*are candidates for proposals under any future open space strategies*”? What evidence is there that the current strategies are inappropriate?

P 9, para 3: the reference to unclassified vegetation is incorrect. The extensive planning carried out to support applications for the Biodiversity Certification Order for the Growth Centres has classified all vegetation within the North West Growth Centre, including the subject lands. Additionally, detailed classification of vegetation within The New Rouse Hill and The Ponds has been carried out to support zoning and subsequent development proposals.

The last sentence of the para. infers that the extensive, expensive studies carried out to date may be deficient. This sentence ought be deleted.

P 12, para 1: Caddies Creek and Second Ponds Creek are part of the Hawkesbury Catchment. They do not drain into it.

P 12, para 2 & 4: flood planning levels are known across the whole of The Ponds and the New Rouse Hill and further studies are not required to support development. Para 4 ought be deleted.

P 12, para 3: extensive, expensive modelling of water quality and the treatment of stormwater runoff exists for the whole of The Ponds and the New Rouse Hill. This includes detailed experimental water quality analysis carried out by Monash University. Further studies are not required to support development.

P12, fig. 10: flood areas are not shown across part of the Precinct within The Ponds and within the New Rouse Hill. Detailed modelling of these creeklines is available from the relevant drainage authority, Sydney Water Corporation.

P 13, para 3: this para is poorly worded. Recent development has occurred most quickly within The Ponds, which for two years has been the fastest selling masterplanned community in Australia.

P 14, fig. 12: the electrical easement across The Ponds has been removed in consequence of the 11kVA line being undergrounded by Landcom through the Precinct, to the south of Schofields Road.

Bushfire prone lands within The Ponds are not shown.

P 15, text: amend to reflect comments below and consequent amendments to this plan.

P 15, fig. 13: this plan has numerous errors:

- the town centre is shown as recent residential development (whereas it contains only 100 apartments over a small footprint
- the creekline between the New Rouse Hill southern and central precincts is incorrectly shown as steep slope, as is the site of Merriville House
- the electrical easement has been removed
- the open space around the lake at The Ponds is incorrectly depicted
- the pattern of residential development to the south of Greenbank Drive and to the east of Caddies Creek is missing
- bushfire prone land within the Ponds is not depicted.

P 16, para 4: words appear to be missing from the end of the second sentence.

P 17, para 1: reference should be made to the building heights approved by the Masterplan Development Application for the New Rouse Hill. As the consent has substantial commencement, these height provisions prevail over those of the subsequent planning instruments which apply to the site. Further, GPT has lodged applications for substantial amendment to the existing planning controls to reflect the JMC approved intended future for extension of the Town Centre over the Northern Frame.

P 18, para 1 & 2: GPT and Lend Lease GPT (Rouse Hill) Pty Ltd both have applications before The Hills Shire seeking amendment to the minimum lot sizes.

GPT's applications relate to the extension of the Town Centre over the Northern Frame. Lend Lease GPT (Rouse Hill) Pty Ltd's applications relate to the central precinct of the New Rouse Hill, located immediately to the south of the Town Centre and which seeks to replicate the minimum lot size controls which were in place before the gazettal of the The Hills Shire's standard instrument LEP.

P 19: this page should make reference to the 200,000m² of retail and commercial floorspace approved of under the approved Masterplan Development Application for The New Rouse Hill. Reference should also be included to the Works Authorisation Deed which applies to the New Rouse Hill Development and which, in concert with the considerable roadworks works already funded and completed by the New Rouse Hill development partners, permits up to 200,000m² of retail and commercial floorspace without further contribution to roadworks.

P 20, diagram: the majority of the land within The Ponds which is shown shaded dark blue has been subdivided and is the subject of various development applications and consents for, in the main, detached dwelling construction. Indeed, many dwellings have already been completed in this area. All of this area ought be shaded light blue and the commentary in para. 3 ought be amended accordingly.

The majority of the Southern and Central Precincts of The New Rouse Hill, which are shaded dark blue, have already been developed with housing and should therefore be shown as light blue (further details of the exact bounds of current development can be provided by Lend Lease GPT (Rouse Hill) Pty Ltd.).

The southern boundary of the opportunity lands to the south of Commercial Road (i.e. the Town Centre Northern Frame) should align with Rouse Hill Drive, rather than being parallel to Commercial Road.

P 20, para 4: reference should be made to both, the approved Masterplan Development Application for the New Rouse Hill which includes detailed controls for the Northern Frame of the Town Centre (located to the south of Commercial Road) and to the detailed development application and other applications currently before The Hills Shire Council for this land which seek various amendment to the existing planning controls.

P 21: the discussion should acknowledge the existing approved Masterplan Development Application which allows for up to 200,000sq.m.of retail and commercial space and a total of 1,800 dwellings. The discussion should also note the capacity of the developers within the Town Centre and Northern Frame to substitute residential development for retail or commercial space.

In addition to "*parking requirements and minimum apartment sizes... restricting the supply of a variety of apartments*" there are a number of other development standards imposed by The Hills Shire which do not serve the potential market in this location (such as requirements for storage) and which are currently impeding a higher density of development in walking distance of the proposed railway station.

- P 22, para 1: the New Rouse Hill is already a “*major transport and retail/commercial hub*”. Opening of the NW Rail will support this function.
- P 22, para 2: there is already an integrated bus network which feeds into the Town Centre and the existing Transitway.
- P 22, para 4: there is already an obligation on Lend Lease GPT (Rouse Hill) Pty Limited to deliver affordable housing within the New Rouse Hill. This document should not allude to a higher obligation as this would be contrary to the provision of the Project Delivery Agreement between The Minister administering the Environmental Planning and Assessment Act and the project partners.
- P 23, plan: a T-way stop is shown at the intersection of Windsor and Commercial Roads. The T-way currently ends at the Town Centre and bus movements to the north are proposed via transit corridors on Schofields Road and Green Hill Drive (and its proposed extension southward to Caddies Boulevard). T-way stops should be shown on both of these routes.

The creekline adjacent White Hart Drive ought be depicted as open space as it has no development potential and showing it as mixed use give a false impression of its development potential (and would affect area based assessments of development potential).

The land to the south of this, which is shown as mixed use, and which is adjacent Mungerie House and which was formerly intended as a recreation centre, is now proposed for residential development. This should be shown as medium density residential development.

Given the scale of Windsor Road, incorporating the T-way, what form of “gateway” is proposed at the southern bound of the Castlebrook Cemetery which will be meaningful? Indeed, the nature, scale, function and utility of gateways in the context of the Town Centre and the surrounding areas is questionable.

The land to the east of Caddies Boulevard, adjacent the Town Centre, in accordance with the approved Masterplan Development Application, ought be shown as being for apartment development. The Minister has entered into an option for sale of this land for apartment development.

The land to the east of Caddies Boulevard and to the north of Rouse Hill Drive, ought be shown for apartment development in accordance with the approved Masterplan Development Application.

The land shown for apartment development within the Central Precinct of the New Rouse Hill should reflect the current applications before Council for amendment to planning controls.

Past experience dealing with the administration of Castlebrook Cemetery would suggest that the implementation of a pedestrian link across Cemetery lands is extremely unlikely.

- P 24, para 1: it should be acknowledged that this structure plan is only one of the matters for consideration in the planning for the future of the New Rouse Hill project. Of more import are the existing approved Masterplan Development Application and the current applications already before Council. These should be specifically referenced here.

- P 24, para 2: the existing planning controls and the approved Masterplan Development Application already “*extend the commercial/retail areas northwards to Commercial Road*”. Thus, the masterplan proposes retention of the current situation – i.e. no change.
- P 24, para 3: the proposed nw/se link at The Ponds lake has already been constructed.
- P 24, para 4: the green link along Caddies Creek is an integral part of the masterplan for the New Rouse Hill and is being delivered by Lend Lease GPT (Rouse Hill) Pty Ltd. This should not be depicted as an innovation of this Structure Plan.
- P 24, para 5: significant effort has gone into the planning of the Town Centre and the delivery of an environment which is of the highest quality. The streetscape “*in and around the station precinct*” are of the highest contemporary standard and do not require upgrading. They may require adjustment to suit the layout of the NW rail.
- P 24, para 6: bullet points 1 – 4 read as if the New Rouse Hill has not benefitted from more than a decade of detailed planning and design by the project partners. All of these “*upgrading(s)*” have already been planned or, in the majority of cases, exist. Indeed, Rouse Hill Town Centre has won both national and international design awards for its considered and appropriate urban design. This report should not imply that the project partners, including the Minister, have got it wrong and that extensive upgrades are required.
- P 24, para 7: a detailed public domain strategy already exists for the New Rouse Hill and is being implemented. This is in addition to a Public Access and Mobility Plan which applies to the Town Centre.
- P 26, para 3: given the area depicted in Fig. 20 is largely the rail corridor and parts of the northern frame – is it really expected that this is to accommodate residential development? If so, how?
- P 26, para 5: almost all of the open spaces depicted have been landscaped or are in the process of so being. As most of the open spaces shown relate to areas of remnant Cumberland Plain Woodland or riparian corridors, the image on p. 26 of the intended open space character should be amended to reflect that the wholesale use of exotic species is not appropriate in these contexts.
- P. 26, fig 21: Castlebrook Cemetery should not be depicted as public domain as it is not publicly accessible.
- P 27, fig. 23: The Northern Frame of the Town Centre and the Town Centre itself ought be shown as land which will provide for jobs. The text adjacent should be amended to reflect the regional retail and employment function of the Town Centre and the Northern Frame.
- P 28, fig 25: The northern part of The Ponds which is depicted as being for low/Medium density townhouses has been subdivided into predominantly large lots and there are many development applications and consents for detached dwellings in this area. There are a 4 small medium density sites which have been sold by UrbanGrowth NSW within this precinct.
- P 29, fig 27: The location of proposed apartment sites, including “sleeve sites” to the current Town Centre buildings and sites proposed for medium density development within the Central precinct of the New Rouse Hill, should be shown as per current applications to Council.
- P 29, fig 28: We are of the view that there is unlikely to be circumstances in the foreseeable future where residential development above 8 storeys is likely to be feasible.

- P 29, fig 29: Given the foregoing commentary it is suggested that the northern section of The Ponds and the southern Precinct of The New Rouse Hill ought be depicted as likely to be unchanged.
- P 30, column 1, bullet point 4: Take up rate over what period?
- P 30, column 3, outcome 1: the proposed residential take up of 40 dwelling p.a. is far lower than has been achieved by the New Rouse Hill project to date (approximately 100 dwellings p.a.). Given the relatively poorer location of future competing residential development, it could be assumed that the theoretical future take up rate should be higher, not lower, than the historical average?
- P 30, column 3, outcome 2: the estimates of increased demand for retail and commercial floorspace seem low relative to the rates of population growth in the primary and secondary trade areas.
- P 30, column 3, outcome 3: whilst the objective of maximising resident population within walking distance of the proposed railway station is understood, we reiterate the advice that development higher than 8 storey, given the significant step in development costs above 8 storeys, is unlikely in the foreseeable future.
- P 31, 6.1: Further change in the planning controls applying to the New Rouse Hill is not supported. Very significant effort has been applied by the project partners over the past decade to planning for the Town Centre and supporting lands. The project partners have incurred significant expense in preparing applications for change to planning controls to return development potential eroded by the The Hills Shire's standard instrument LEP. Development applications and planning proposals are currently being considered by Council and proposing a further raft of changes is only likely to impede, not facilitate, further development. However, current Development Control Plan provisions relating to minimum apartment floorspaces, and policies relating to parking and storage ought be amended to allow the production of product which is better suited to the current market and which reflects the improved accessibility which will come with the delivery of the NW Rail.
- P 31, 6.2: Given the high quality of public domain delivered and planned for implementation within the New Rouse Hill, the text should acknowledge that these recommendations apply to land which is outside of the New Rouse Hill project.