



CBa/CS
14420
16 December 2014

Ms Carolyn McNally
Secretary
NSW Department of Planning and Environment
23-33 Bridge Street
SYDNEY NSW 2000

Dear Ms McNally

SUBMISSION TO PROPOSED CHANGES TO PLANNING CONTROLS IN THE AREA 20 PRECINCT

Thank-you for providing the opportunity to make a submission on the proposed changes to planning controls in the Area 20 Precinct (the Precinct).

This submission has been prepared by JBA on behalf of Ingenia Communities who own land located at 51 Terry Road, Rouse Hill (The Site) within the Precinct. It requests that as part of considering these changes that further changes also be made to existing planning controls affecting the Site, and potentially adjoining areas.

There are a number of compelling planning reasons for supporting increased yield on the Site:

- it has outstanding accessibility to high quality public transport;
- it will better support the growth of the Rouse Hill Planned Major Centre;
- it is consistent with the emerging evolution of suburban and greenfield area planning, as evidenced by nearby recent development applications; and
- it will satisfy market demand and provide greater housing choice and diversity.

On this basis, it is requested that increased yield be facilitated through amending existing planning controls to increase maximum building height from 8.5m to 18m for the Site and a concurrent increase in FSR.

1.0 THE SITE

The Site is located at 51 Terry Road, Rouse Hill (Lot 134 DP208203). It is a large, generally rectangular shaped lot with frontage to Terry Road (refer **Figure 1** and **Figure 2**). It is located within the Blacktown Local Government Area (LGA).

The Site is currently occupied by a caravan park.



Figure 1 – Approximate boundaries of the Site
Source: NearMap



Figure 2 – The Site viewed from Terry Road
Source: Google

2.0 THE NORTH WEST GROWTH CENTRE

The Site is included in the North West Growth Centre (the NWGC). At completion, it is forecast to be home to around 200,000 residents in 70,000 dwellings. The NWGC will be supported by a Planned Major Centre at Rouse Hill and the North West Rail Link.

The North West Structure Plan sets out the conceptual framework for the North West Growth Centre.

Figure 3 shows the location of the Site within the context of this Structure Plan.

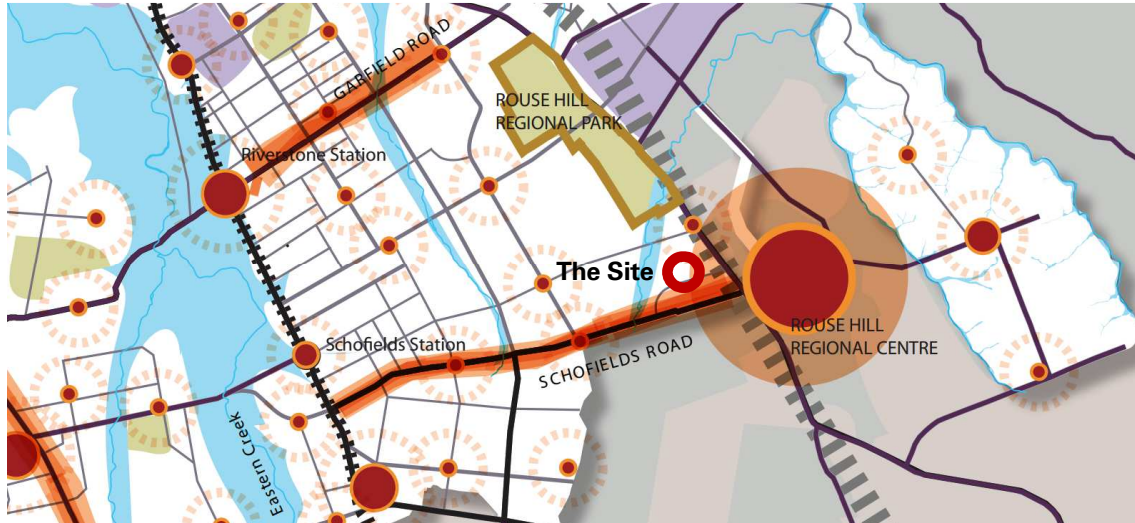


Figure 3 – Approximate location of the Site within the NWGC Structure Plan
Source: Growth Centres SEPP

3.0 THE AREA 20 PRECINCT

The Site is included within Area 20 of the North West Growth Centre. The Area 20 Precinct comprises 245 hectares of predominantly rural residential and agricultural land located to the immediate north-west of the Rouse Hill Town Centre.

It was rezoned in October 2011 and as such was one of the First Release Precincts in the North West Growth Centre. In its current form, the rezoning facilitates 6,400 new residents in 2,500 dwellings and includes:

- the North West Rail Link corridor, including a new station at Cudgegong Road and supporting commuter car park;
- a network of centres, including a Town Centre at Cudgegong Road;
- a mix of housing types, particularly higher density dwellings such as town houses and villas; and
- land for local open space and environmental protection.

Development is to occur generally in accordance with the Indicative Layout Plan as shown in **Figure 4**.

The Precinct is strategically located close to the Rouse Hill Planned Major Centre, and will be serviced by the Rouse Hill and Cudgegong Road rail stations, providing it with a high level of public transport accessibility.



Figure 4 – Area 20 Precinct Indicative Layout Plan
Source: Growth Centres SEPP

4.0 EXISTING PLANNING CONTROLS

4.1 The Growth Centres SEPP

The Growth Centres SEPP is the principal planning instrument for the Site and surrounding land. It zones land, sets out land use permissibility and includes controls covering matters such as retention of existing native vegetation on a Precinct basis.

The SEPP is supported by the Blacktown City Council Growth Centre Precincts Development Control Plan 2010 (the BCC Growth Centre DCP) which addresses matters such as neighbourhood, subdivision and residential design.

Table 1 shows the key controls that apply to the Site under the SEPP.

Table 1 – Existing key planning controls for the Site

Zoning	R3 Medium Density Residential
FSR	1.75:1 maximum
Height	8.5m maximum
Density	25 per hectare minimum

While the zoning, FSR and density are similar for the Site and surrounding land, the maximum building height for the Site is substantially less than most other land in the Area 20 Precinct (refer **Figure 5**). In particular, immediately adjoining land to the north has a height of 12m, as does land across the NWRL corridor to the south. Nearby land to the east has a height of between 16m and 18m. There appears to be no planning reason as to why this height distinction has been made especially given the sites adjacency to the proposed Cudgegong Station.



Figure 5 – Maximum building height
Source: Growth Centres SEPP

5.0 PROPOSED PLANNING CHANGES

Primarily in response to the finalisation of the alignment for the North West Rail Link (NWRL) and the design of the Cudgegong Road Station and Town Centre, the Department of Planning and the Environment is proposing changes to the Growth Centres SEPP. These changes will rezone land and increase maximum permitted building heights in some locations. These changes will better support longer-term development outcomes and the principles of transit oriented development.

While no changes are proposed for the Site, within this context (particular better supporting transit oriented development) the changes are of a high level of relevance to the Site and its future potential.

6.0 SUITABILITY FOR GREATER SITE YIELD

It is acknowledged that under the current planning controls for the Precinct, the Site can be developed for higher density residential uses. However, considering the Site's attributes, the maximum building height limit of 8.5m constrains development outcomes to typically suburban built form that does not make the most of its strategic location. It is considered that the Site, and surrounding Precinct, can be considered for greater development yield for a range of reasons.

6.1 Outstanding accessibility to high quality public transport

Pursuant to a government strategic planning documents, including section 117 directions and the draft Metropolitan Strategy for Sydney to 2031, it is Department of Planning and Environment policy to encourage greater transport and land use integration through facilitating higher density housing in proximity (400 – 800m) to public transport nodes such as rail stations. Not only is the Site located within 800m of the proposed Rouse Hill rail station, it is also located just outside the 800m catchment of the proposed Cudgegong Road rail station. This provides excellent access to high capacity rail providing frequent connections to major employment destinations such as Macquarie Park, Chatswood and the Sydney CBD.

6.2 Supporting the growth of the Rouse Hill Planned Major Centre

The Site is located within the general catchment of the Rouse Hill Planned Major Centre. The draft Metropolitan Strategy for Sydney to 2031 sets the following priorities for this centre:

- *“strengthen as a higher intensity, mixed-use major centre serving the new communities of the North West Growth Centre and surrounds via the North West Rail Link*
- *capitalise on the important cultural contribution of Rouse Hill House and Farm and Rouse Hill Regional Park*
- *provide capacity for at least 6,000 additional jobs to 2031.’*

The North West Rail Link Corridor Strategy provides a vision for the future of Rouse Hill. This vision includes the following outcomes:

- *‘The introduction of the NWRL will enable the Study Area to become a major transport and retail/commercial hub for the surrounding suburbs centred on a new train station and a hub for the North West Growth Centre*
- *The introduction of the NWRL has the potential to transform the Study Area into a Major Centre enabling significant residential and commercial uptake in the surrounding areas*
- *The NWRL will also provide opportunities to increase residential densities within walking distance of the station, involving a variety of housing types to ensure there is affordable and appropriate housing for all members of the community.’*

Figure 6 shows the proximity of the Site to this centre, as well as the existing zoning pattern. The setting of appropriate planning controls covering zoning, FSR and height within the catchment of centres is a key way in which these outcomes can be achieved.

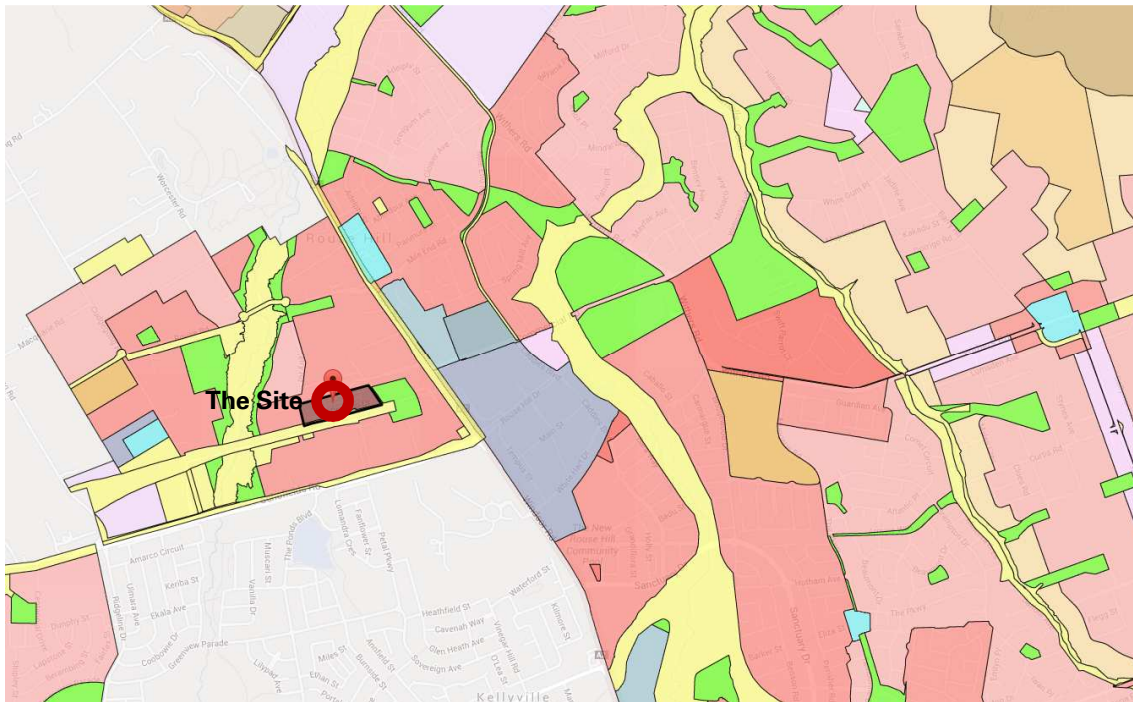


Figure 6 – Zoning around the Rouse Hill Planned Major Centre
Source: NSE Department of Planning and Environment

The draft Sub-regional strategies prepared under the former Metropolitan Plan provide guidance in terms of what constitutes an appropriate centres catchment. For town centres, a catchment having a radius of up to 1km is considered appropriate to facilitate increased housing and jobs.

The Rouse Hill centre is included in the B4 Mixed Use zone. Surrounding land is included in variety of zones, including residential zones such as the R3 Medium Density Residential zone and the R2 Low Density Residential zone and business zoned such as the B5 Business Development zone.

The centre has a height limited of up to 36m. Land adjoining the Site has heights of between 16 – 18m. Other land has substantially lower maximum building height limits in the vicinity of 10 – 12m.

Boundaries of the centre

Review of the natural attributes of the Rouse Hill centre shows a strong natural boundary generally aligned with a 1km radius from the town centre in the form of waterways and space corridors almost encircling the centre. This area includes much of Area 20, including the Site. Consequently, this area should be considered to be part of the catchment of the Rouse Hill Town Centre with planning controls established to support the functioning of the centre.

Yields

However, due to a number of constraints, likely development take-up in much of this area is likely to be low over the short-term. These constraints include:

- recent commercial (Rouse Hill Town Centre) and residential development, mostly of a lower density nature such as The Ponds
- the Castlebrook Lawn Cemetery and Crematorium, which occupies most the southwest quadrant of the centre catchment.

Consequently, more unconstrained land should be made to deliver greater yields to compensate for this.

On this basis, the existing height limits unduly constrain development on the Site and are considered deficient to achieve metropolitan priorities or enable the realisation of the Town Centre as the true major centre for the NWGC, consistent with emerging trends in planning for similar centres that are highly accessible to quality public transport.

6.3 The evolution of suburban and greenfield area planning

Sydney is growing and changing. By 2031, Sydney's population is forecast to grow from 4.29 million to 5.86 million. This translates to an increase of over 1.5 million people. In addition to this, our population is changing, with an increasing number of older persons, lone person households and overseas migrants. This growth and change requires the provision of an additional 664,300 new homes between now and 2031. It also means that there will likely be an increasing demand for smaller, well located homes such as apartments close to facilities and transport.

However, data shows that actual dwelling approvals have not kept pace with demand for a number of years. For example, Sydney delivered just over 29,000 new homes in 2012 compared to a demand of over 32,000. This is having significant adverse consequences for housing affordability.

In response to this, the NSW Government has initiated a range of planning activities that seek to consider increasing housing densities in not just infill locations but also in greenfield locations. This is in particular evidenced by the Housing Diversity Package and the Urban Activation Precinct (UAP) program.

Urban Activation Precincts

In early 2014, the NSW Government designated the Bella Vista, Kellyville and Showground Precincts of the NWRL as UAPs. The intent of the UAP program is to facilitate additional housing and jobs by unlocking land for greater yield. Based on site context and precedents from other, already planned UAPs including those in more suburban locations such as North Ryde, Showground Road and Bella Vista, it is likely that these precincts will be planned for mixed use and higher density residential development in buildings upwards of 20 storeys.

The selection of these two locations for urban renewal represents a major shift in planning in Sydney. Traditionally, mix of uses, higher densities and taller buildings were confined to more inner parts of the city and regional cities such as Parramatta and Liverpool. However, for the first time, the Government is now seeking to increase yields in lower order outer suburban centres where justified by concurrent investment in high quality public transport.

It is noted that unlike Rouse Hill, none of these Precincts are designated as major centres under the draft Metropolitan Strategy. On this basis, together with its designation as the main centre for the NWGC, it is conceivable that yields in and around Rouse Hill should be greater than what will be planned for these Precincts.

Housing Diversity Package

Driven by changes in demographics, affordability and lifestyle trends, recently changes have been made to the planning framework covering development in the NWGC through the introduction of the Housing Diversity Package to facilitate more affordable and diverse housing by increasing the range of housing types permitted in residential zones. This will help bring more homes to the market, place downward pressure on prices and provide a greater range of housing choices for new residents in the Growth Centres. The changes give developers flexibility in delivering smaller homes on smaller lots and are based on successful practices that are already in use by some local councils in the Growth Centres and other areas of Western Sydney.

Together, these initiatives are signalling a change in attitude towards planning for greenfield locations such as Area 20. It will also start to address the marked imbalance in housing being built in the growth centres compared to the type of housing Sydney residents want, as shown in **Figure 7**.

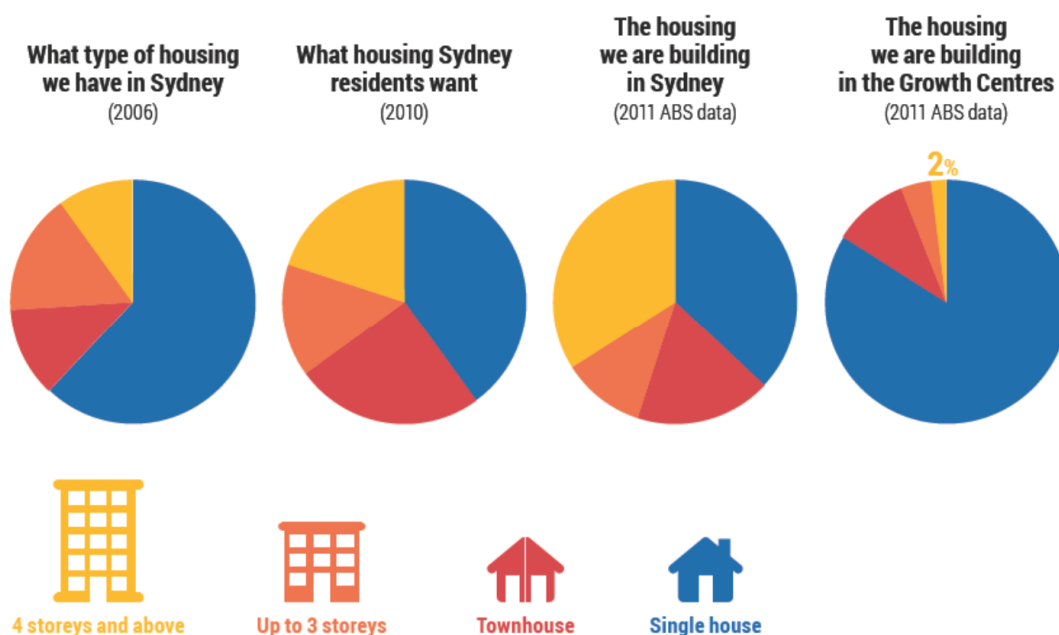


Figure 7 – Current housing demand vs current delivery
Source: NSW Department of Planning and Environment

6.4 Recent development applications

Recent development application lodged in the general surrounding area is further evidence illustrating the changing approach to greenfields planning.

Land on the corner of Rouse Road and Terry Road just to the north of the site and included in the same R3 Medium Density Residential zone is proposed to be developed for a series of four storey Residential Flat Buildings. The development application for the proposal is recommended for approval at the JRPP meeting scheduled for mid-December 2014.

This land is more removed from the Rouse Hill Town Centre than the Site.

6.5 Alignment with strategic planning documents

The draft Metropolitan Strategy for Sydney to 2031 set the following key outcomes for the city:

- balanced growth;
- a liveable city;
- productivity and prosperity;
- healthy and resilient environment; and
- accessibility and connectivity.

These outcomes are to be achieved through a range of policy settings designed in accordance with principles such as:

- promote and facilitate growth; and
- provide housing choice while substantially increasing supply to capitalise on existing and planned infrastructure and provide market-led solutions.

For the North West Sub-region, this translates into a number of metropolitan priorities, including:

‘diversify housing opportunities by providing greenfield housing in the North West Growth Centre and on other major Sites and intensifying housing development around Parramatta CBD and adjacent suburbs, as well as identified centres and Precincts along the new North West Rail Link, Western Rail Line, South Line, Cumberland Line, Inner West Line, Bankstown Line, and the Liverpool to Parramatta Transitway’.

The intent of higher level planning policy is supported by the Growth Centres SEPP, which includes aims for the entire Growth Centres and the Area 20 Precinct such as:

- *‘to enable the establishment of vibrant, sustainable and liveable neighbourhoods that provide for community well-being and high quality local amenity*
- *to provide for multifunctional and innovative development in the Precinct that encourages employment and economic growth*
- *to promote housing choice and affordability in the Precinct.’*

Facilitating the delivering of higher density apartment style dwellings on the Site and surrounding Precinct is consistent with, and will promote the achievement of these outcomes and aims. In particular, it will maximise the government investment in the NWRL, increasing the potential for public transport use, and promote housing choice and deliver, with apartment being underrepresented in the growth centres relative to single houses and town houses (refer **Figure 7**). This requires a revisit of the site’s current height and FSR controls.

6.6 Market demand

There is recognised strong market demand for additional housing, in the NWGC in particular higher density housing forms in accessible locations. This is reflected in the NWRL Link Corridor Strategy, which states in relation to Rouse Hill:

‘demand is related to the high level of amenity and quality of life afforded within Rouse Hill, the demand for housing diversity and improved access to social, recreational and employment opportunities as a result of the North West Rail Link.’

6.7 Absence of key constraints

Unlike many other parts of the Area 20 Precinct, the Site is not subject to high level of environmental constraints such as threatened species, bushfire hazard and heritage that constrain development and as such would be suitable for higher density housing and a revisit of its controls **Figure 8** clearly shows this lack of constraints.

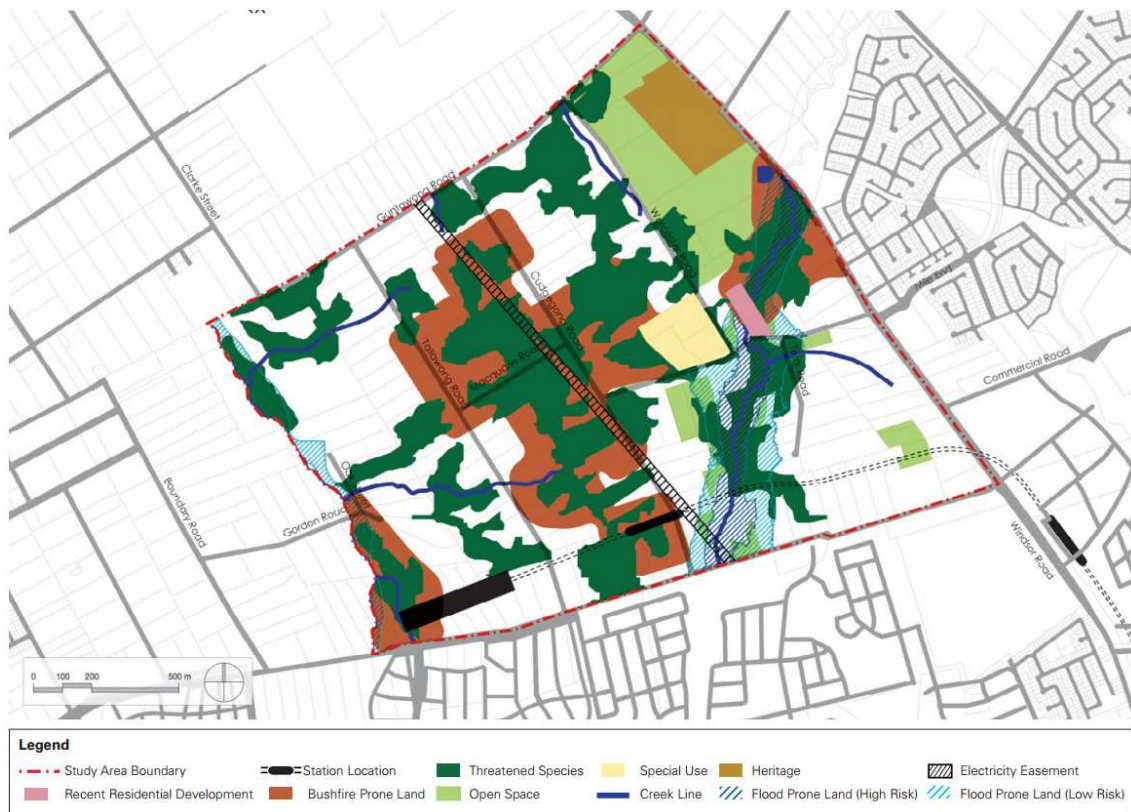


Figure 8 – Land use constraints in Area 20 and surrounds
 Source: North West Rail Link Corridor Strategy

6.8 Large, un-fragmented Site

The Site comprises large, un-fragmented land in the ownership of a development company that has the capacity and willingness to invest in developing the Site for high quality residential outcomes consistent with the objectives for the Area 20 Precinct.

7.0 PROPOSED FURTHER CHANGES TO THE GROWTH CENTRES SEPP

Based on the reason outlined above, it is requested that as part of the current proposal, planning controls for the Site that hinder the achievement of strategic planning objectives also be amended.

It is requested that the current height limit applying to the Site of 8.5 metres be increased to at least 18m, which is consistent with nearby land also located in the Area 20 Precinct, and that FSR controls also be increased (we would suggest to around 2:1).

8.0 CONCLUSION

There are a number of compelling planning reasons for supporting increased yield in the form of medium density apartments delivered through increased height limits on the Site:

- it has outstanding accessibility to high quality public transport
- it will better support the growth of the Rouse Hill Planned Major Centre
- it is consistent with the emerging evolution of suburban and greenfield area planning, including as evidenced by nearby recent development applications
- it will promote of the outcomes and aims sought by key government strategic planning documents
- it will satisfy market demand for additional housing, in particular the underrepresented apartment housing stock

- the Site an absence of key constraints that preclude or limit development
- the Site comprises large, un-fragmented land in the ownership of a company that has the capacity and is willing to develop a high quality, higher density residential development.

Increased yield will deliver a range of positive outcomes for the Area 20 Precinct, the Rouse Hill Planned Major Centre and the broader NWGC, in particular providing greater housing choice and diversity.

On this basis, it is requested that increased yield be facilitated through amending existing planning controls to increase maximum building height from 8.5m to 18m for the Site and a concurrent increase in FSR (we would suggest in the vicinity of 2:1 is more appropriate).

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

Yours faithfully



Chris Bain
Principal Planner



Clare Swan
Director

CC: Joss Engebretsen, Ingenia Communities