



30 June 2017

Our ref: DHB/15-216C

Secretary
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Madam,

re: North West Priority Growth Area Land use and Infrastructure Implementation Plan

We write on behalf of The GPT Group (GPT) in response to the exhibition of the North West Priority Growth Area Land use and Infrastructure Implementation Plan (LUIIP) which is on exhibition until 27 June 2017.

GPT is an owner and manager of a diversified portfolio of high quality retail, office and logistics property assets in Australia including Rouse Hill Town Centre located within the Rouse Hill Regional Centre. This centre is located immediately adjacent to the North West Priority Growth Area.

The NSW Government acquired the land which now comprises the Rouse Hill Regional Centre in the early 1980's with the vision of creating a new centre to service the needs of the growing north-western region of Sydney. In October 2003, GPT/Lend Lease Development was selected as the joint venture partner to the NSW Government to develop the Regional Centre.

The Rouse Hill Regional Centre is developing in accordance with an Masterplan that provides the Rouse Hill Town Centre as the focal point with an approved capacity of 200,000 square metres of retail and commercial uses. The centre currently comprises approximately 70,300 square metres of floor space with plans for an additional 31,000 square metres including a department store.

The LUIIP updates the planning framework for the North West Priority Growth Area in light of the extent of urban development and demand for housing that has occurred since the release of the North West Growth Centre Structure Plan 2006 (the Structure Plan). It also builds on the framework set in the draft West and West Central District Plans released by the Greater Sydney Commission in late 2016.

The LUIIP guides a future urban structure, including new centres to support places for offices, shops, cafes and supermarkets, open space networks for recreation and connections with green space, and future road and passenger rail networks to connect future residents to the surrounding areas and beyond.

The Rouse Hill Town Centre has the capacity and potential to meet the centres requirements off the North West Priority Growth Area. It is submitted that:

- The LUIP should give greater emphasis to the role of the Rouse Hill Regional Centre in meeting the retail, employment and community facilities needs of the North West Priority Growth Area;
- The role and function of any proposed retail hubs along the Schofields Road from Rouse Hill to Marsden Park should be clarified so that the role and function of these hubs is known and ad hoc and opportunistic development proposals are prevented;
- It is considered that any determination of the role and function of Marsden Park should await resolution of existing barriers to growth as a centre including a firm commitment to extending the Sydney Metro North West from Cudgegong Road to Marsden Park. Until that time Marsden Park employment area should have a complementary role to Rouse Hill regional centre rather than a competing role.

GPT support the efforts of the Department of Planning and Environment in its strategic planning initiatives in planning for growth and putting the necessary infrastructure in place to support growing communities. GPT appreciates the opportunity to provide comment on the LUIP.

1. More recognition should be given to the role of Rouse Hill Regional Centre

It is submitted that the LUIP should give greater emphasis to the role of the Rouse Hill Regional Centre in meeting the retail, employment and community facilities needs of the North West Priority Growth Area.

Since the commencement of planning for the North West Sector many years ago, Rouse Hill Regional Centre has been recognised as the major regional centre servicing the north west, including the North West Priority Growth Area. Rouse Hill is an established centre providing a wide range of retail and community services and jobs and has capacity for significant expansion to meet the projected demands of the region.

No doubt because it is located outside (but immediately adjoining) the North West Priority Growth Area, the LUIP gives little credence to the role and function of Rouse Hill Regional Centre. GPT submits that the role of Rouse Hill as the major retail and centre for the region should be recognised and supported in the LUIP.

The lack of recognition of Rouse Hill leads to a focus of the LUIP on the future development of Marsden Park. The plan states that:

Marsden Park is an increasingly significant hub for business and employment in Sydney. With the introduction of a new public transport corridor from the Sydney Metro Northwest, Marsden Park will become a focus area of the North West Priority Growth Area and surrounding areas.

Infrastructure investment in the region is for the broader north west region including areas like Rouse Hill Town Centre outside the LUIP. The LUIP recognises increased demand on existing strategic infrastructure and notes the commitments to key infrastructure upgrades such as Windsor Road and Sydney Metro Northwest. The increases in density and associated infrastructure as a result of the LUIP shouldn't be at the expense or cost of established centres well connected centres like Rouse Hill Town Centre.

Rouse Hill Town Centre is currently a focus area of the North West Priority Growth Area and surrounding areas with good public transport and potential for growth. This should be given



greater recognition in the LUIP by clear statements on the role and function of Rouse Hill Town Centre as a major retail and employment centre.

2. A more clearly stated centres hierarchy is required

Centres planning in Sydney has focussed on centres where retailing and employment can concentrate taking advantage of agglomeration effects and economies of scale and supporting transport nodes. This allows efficient planning for transport and community infrastructure. A hierarchy of centres is desirable so that roles and functions can be identified and supported by investment decisions, giving greater certainty to investors, retailers and the community generally.

The LUIP Implementation Plan *identifies a new growth corridor along Schofields Road from Rouse Hill to Marsden Park. The Department will undertake a strategic land use review within the growth corridor, taking into account the expected growth as well as committed and planned infrastructure upgrades including Sydney Metro Northwest, the upgrade of Schofields Road, and the public transport corridor between Rouse Hill and Marsden Park. The review will take into account new opportunities for homes and jobs to maximise the benefits of new infrastructure.*

The planned review is expected to include:

- identify the potential population catchment adjacent to the Schofields Road corridor within Rouse Hill, Riverstone, Schofields, Marsden Park and the Ponds, and associated retail and employment requirements required to support the population;
- leverage off future connections to the corridor from the Sydney Metro Northwest to Marsden Park;
- review the role and function of Marsden Park to meet the need of future residents and employees in the west of the Priority Growth Area, and in light of its potential to strengthen the Priority Growth Area's retail offering;
- review the role and function of other centres within the corridor such as Schofields Station interchange as a key transport node;
- result in a corridor strategy and identify opportunities to strengthen retail and employment hubs in locations adjacent to public transport such as Schofields Station and Marsden Park.

The LUIP creates the potential for additional centres to be proposed with little guidance on the demand for, and ideal location of, such centres and the role they would play in the hierarchy of centres serving the North West. This has the potential to affect the viability of existing and planned centres. It is submitted that further guidance should be given to the review in terms of a clearly stated centres policy to prevent the proliferation of centres along the corridor and the dilution of investment in existing and planned major centres.

Further ribbon development should be avoided as it delivers poor outcomes from an urban design perspectives and disperses travel patterns leading to more car dependent development. Development focussed in centres is preferred.

Centres planning in Sydney has previously focussed on centres where retailing and employment can concentrate taking advantage of agglomeration effects and economies of scale and supporting transport nodes. This allows efficient planning for transport and

community infrastructure. A hierarchy of centres is desirable so that roles and functions can be identified and supported by investment decisions, giving greater certainty to investors, retailers and the community generally.

The role and function of any retail hubs along the corridor should be clarified so that ad hoc and opportunistic development proposals are prevented.

It is submitted that the LUIP should be amended to:

- better co-ordinate with the broader strategic land use objectives for the North West Growth Sector including the major role of the Rouse Hill Town Centre
- respect and reinforce the centres policy and retail hierarchy through more clearly defined roles and functions of centres.

3. Future of Marsden Park

As stated above the LUIP recommends a review of the role and function of Marsden Park to meet the need of future residents and employees in the west of the Priority Growth Area, and in light of its potential to strengthen the Priority Growth Area's retail offering.

The LUIP makes it clear that future growth at Marsden Park would leverage off future connections to the corridor from the Sydney Metro Northwest to Marsden Park. However, no commitment has been made to this future connection.

Marsden Park currently has a number of barriers including:

- No railway station and limited road transport capacity;
- A lack of community infrastructure;
- A current role centred on employment in light industrial zoned and bulky goods retailing.

Further, to our knowledge, there has been no comprehensive assessment of the demand for additional retail floor space, the type of retail space required and the appropriate hierarchy of centres to meet identified demand.

The potential for Marsden Park to development as a retail centre to serve the western part of the North West Priority Growth Area is recognised. It is considered that any determination of the role and function of this centre should await resolution of these barriers including a firm commitment to extending the Sydney Metro North West from Cudgegong Road to Marsden Park. Until that time Marsden Park employment area should have a complementary role to Rouse Hill regional centre rather than a competing role.



4. Conclusion

We thank you for the opportunity to make this submission. We are available to provide any clarification on the above and to participate in planning growth and infrastructure for the North West Priority Growth Area.

Yours faithfully

BBC Consulting Planners

A handwritten signature in blue ink, appearing to read 'Dan Brindle', is written in a cursive style.

Dan Brindle

Director