

**NSW Department of Planning & Environment**  
10 Valentine Avenue,  
Parramatta, NSW 2150

**Sent via Online Submission**

04 July 2017

Dear Sir/Madam,

**RE: Submission in response to Northwest Draft Exhibition Package.**

**Subject Site Street address:** 72 Tallawong Rd, Rouse Hill, NSW, 2155

**RDP:** 65//DP30186

**Land area:** 5 Acres

**Proximity to the Northwest Metro Rail Station:** 400 metres – five-minute walk



The Department of Planning are currently exhibiting the "North West Land Use and Infrastructure Implementation Plan". There are proposed changes on exhibit in relation to altering the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*. And also the applicable *Growth Centre Development Control Plan 2017*.

The proposed changes including an introduction of a maximum density cap of 25-35 dwellings per hectare for 72 Tallawong Rd, Rouse Hill (herein referred to as the site), doesn't make planning sense and will lead to a poor outcome for the residents of Sydney. It ignores the directive for transit oriented development to provide social, economic and environmental benefits to future communities noting the site's close proximity to the Northwest Metro rail station, associated amenities and ample open space.

The exhibited changes to the site are not evidence-based as they are at odds with the recommendations found in the exhibited technical studies and contradict the objectives and recommendations of the statutory framework that ought to be underpinning planning including the Implementation Plan itself.

There is an undeniable consensus in current planning policies, that sites within close proximity to train stations in the growth centres of North West Sydney should be prioritized for higher density planning controls. Our submission is that the proposed cap on the site, is abandoned in favour of a higher density range of at least 100 units per hectare in line with other similar properties in close vicinity to the site and the new Northwest Metro rail station.

If the changes as exhibited were to be implemented the result would be, that there are less homes available next to the new train station located between Tallawong Rd and Cudgegong Rd due to open in 2019. This is despite the fact that there is already limited availability for residential development in the area, due to land space occupied by the stabling yards. This is completely inconsistent with the stated objective of the implementation plan and there is an absence of an adequate justification for this proposal.

There is no justification in the government investing billions in the Northwest metro train line, only for the Department of Planning to propose changes that will significantly reduce the number of homes available in such close proximity to the station. The proposed changes to planning controls for the site, would prevent the area from meeting its full potential through missed opportunities to maximize social, economic and environmental advantages of transit oriented development such as reduced reliance on private cars, increased connectivity for a greater share of residents, meeting demand for affordable denser housing options and failure to promote fast-uptake of the new metro line.

The proposed planning changes to limit the density to 35 dwellings per hectare, would not meet the expectations of the general public. The exhibited changes to the site, are not in the public interest and fail to achieve the desired outcomes for the North West Growth areas as espoused in various statutory planning documents.

The proposed density cap for the subject site is particularly low, despite the property's close proximity of 400 metres (five minutes walking distance) to the train station and associated amenities such as the proposed retail centre.

Furthermore, the property is a "greenfield" site that would not entail the wasteful exercise of bull-doing existing homes, as is likely to be the case along other Northwest Metro Stations.

The site is entirely free from building constraints and is ready for development.

Not only is the site within easy walking distance to the station, it is also surrounded by ample open space and parks. It is within a couple of minutes walking distance to Cudgegong Reserve and the new sporting fields on Tallawong Rd.

Furthermore, the position of the site is in area where the availability of land for residential purposes is already highly limited. The site, 72 Tallawong Rd, Rouse Hill, is located in very close proximity to sporting fields and stabling yards already located on the southern portion of Tallawong Rd, Rouse Hill. The residential population of Riverstone East will always be limited by this industrial usage.

The scope of the proposed changes are wide-ranging and cover a large geographical area, It is clear that the unique characteristics of this site (72 Tallawong Rd, Rouse Hill) has not been adequately taken into consideration. It is an area that already has very limited capacity for residential development (due to the stabling yards in particular) despite its excellent location of being within five walking distance of multiple parks and the new Northwest Metro train station.

The public interest of the future communities should not be compromised by any possible difference in “bargaining power” of developers in areas that were released prior to the subject site, such as in Area 20. The proposal to allow higher densities in area 20 than Riverstone East is arbitrary. Both of these “planning precincts” are currently part of the same suburb of Rouse Hill with Blacktown City Council. It is proposed that they remain within the same suburb but be renamed in coming years to either Tallawong, Cudgegong Rise or Whitlam Heights. As such there is no justification for the variances between the proposed density restrictions in these two planning precincts.

Further-more the fact that there have been approvals for higher density developments in areas that lack easy access to transport and amenities is not a reasonable reason to limit the development potential of this site, and sites similar to it in the Stage 1, Riverstone East Area. The public interest in developing this site, to its full potential for the community should not be compromised by less than optimal planning outcomes in other areas where developments have already been approved. It is not permissible for the planning of Riverstone East to be an “after thought”.

The proposal to cap density to a maximum of 35 dwelling on the subject site, just isn't logical. It is in the public interest for this site to be supported with adequate infrastructure and prioritized for high density residential development of at least 100 dwellings per hectare

Factors supporting increased density:

1. Close proximity – 400 metres to the new North West Metro Station.  
The site is in a desirable location being in a close proximity of 400 metres (five minute walk) to the Northwest Metro Rail Link train station currently under construction between Tallawong and Cudgegong Rds. It is therefore also placed in close proximity to associated amenities such as a planned retail precinct. The decision to change

planning controls to reduce the number of homes on the site makes no planning sense.

2. Link to wider Sydney - It has been confirmed that the station between Tallawong Rd and Cudgegong Rd will link to the Sydney Metro by 2024 creating a direct link to the CBD in under 50 minutes. The NSW Department of Transport has also secured a corridor of land to likely link the station to the existing City-Rail network at Schofield's train station. As such the location will have easy access to the CBD (via two separate connections), the Hills area, Northwest, Greater West, South West and beyond which will make it a desirable place to live and fuel demand for increased density.
3. The Government's stated objectives through multiple planning policies to deliver better Transit Oriented Development demands that the site be zoned at a much higher density than the proposed maximum of 25-35 dwellings per hectare.
4. Close proximity to open space - The site is located next to parks, its eastern border backs on to Cudgegong Reserve, and the proposed sporting fields are across the road to East of the site. This makes it a suitable area for higher density development.
5. There is already very limited capacity for residential development in areas adjacent to the site at Riverstone East, due to the Tallawong Rd Stabling Yards - Therefore, there won't be an overcrowding issue at this specific site if the density is increased.
6. The site is free from all building constraints and is ready to be developed.
7. It is a largely vacant land and is a "greenfield" development sites to be preferred over the wasteful exercise of bull-doing existing suburban developments as is proposed to take place along other Northwest Metro stations such as Bella Vista and Castle Hill.
8. The failure to increase zoning at the site would create negative effects on housing affordability by not providing for sufficient dwellings to be released and in particular apartments where there is clearly a greater demand for it (within walking distance of train stations and parks). This is against the government's stated desired outcomes.
9. The failure to increase zoning at the site would create a poor outcome by failing to deliver a range of housing options where it is most likely to be in demand.
10. The studies on exhibit, don't provide support for the changes proposed by the department of planning. There is no justification in the government investing billions in the Northwest metro train line, only for the Department of Planning to propose changes that will significantly reduce the number of homes available in such close proximity to the station. The proposed changes to planning controls for the site, would prevent the area from meeting its full potential through missed opportunities to maximize social, economic and environmental advantages of transit oriented development such as reduced reliance on private cars, increased connectivity for a greater share of residents, meeting demand for affordable denser housing options and failure to promote fast-uptake of the new metro line.
11. The proposed planning changes to limit the density to 35 dwellings per hectare, would not meet the expectations of the general public. The exhibited changes to the site, are not in the public interest and fail to achieve the desired outcomes for the North West Growth areas as espoused in various statutory planning documents such as the Implementation Plan, A Plan for Growing Sydney, The State Environmental Planning Policies, Long Term Transport Master Plan and Rebuilding NSW - State Infrastructure Strategy 2014, reports published by the Greater Sydney Commission including "A draft amendment to update a Plan for Growing Sydney - *Towards our*

- Greater Sydney 2056* – Published November 2016 – Greater Sydney Commission, *North West Rail Link Corridor Strategy for Cudgegong Station* released in 2013 etc...
12. There is an undeniable common theme that housing density should be prioritised in areas where there has been an investment in transport such as close to the Metro train stations.
  13. One of the intended actions of the implementation plan is to deliver more dwellings. The proposed amendment to planning controls governing this site is completely inconsistent with this stated objective. The only way to achieve this is to increase the density
  14. There is no justification for the inconsistencies in the proposed maximum dwelling limits for R3 zoned land in Area 20 and Riverstone East sites, with such extremely different variances being proposed despite the areas both being in Rouse Hill and in close proximity to the new train station.
  15. The Blacktown council is currently displaying proposals to name ten new suburbs in the Northwest Growth Area. It is of note that Riverstone East and Area 20 will be part of one brand-new suburb named either, a) Tallawong; b) Cudgegong Heights or c) Whitlam Heights. This highlights the fact that the proposed vast differences in zoning in Area 20 and Riverstone East make no sense. They are currently part of the same suburb (Rouse Hill) and in future will be part of the same suburb. The distinction between Area 20 and Riverstone East is purely arbitrary.
  16. If the department of planning is concerned with over-development in areas of the northwest priority area, it ought to address that concern meaningfully by targeting areas of excess density that do not possess areas of close proximity to transit or other amenities. The proposed changes are too wide-ranging and not well thought out. It is not in the public interest and against good faith to zone land inappropriately in areas of high amenity such as the subject site, due to over development taking place in other areas.
  17. The people of Sydney deserve better than planning in high amenity areas close to public transport and open space such as this site, to simply be an after-thought.
  18. This is particularly pertinent having regard to the housing shortage within Sydney driving the prices of properties to unaffordable levels for many young working Australians. As well as the fact that transport in North Western Sydney could be greatly improved upon with better access to the North West Metro rail line.
  19. SEPP 65 already provides a framework for consistent apartment design policy throughout the state. The new proposed changes add yet another layer of planning controls in Northwest Sydney. It doesn't make sense to propose new and different rules to the rest of Sydney. SEPP 65 confirms the importance of providing apartments close to public transport and existing services which as per the department's website "...reduces car usage, pollution and congestion, and increases the potential for residents to walk to and use public transport with the associated health benefits; and it encourages a more consistent approach to design across the state, more certainty for councils, architects and applicants, and design innovation. It doesn't make sense to limit density to only 35 dwellings per hectare.
  20. The exhibited changes to the site are not evidence-based as they are at odds with the recommendations found in the exhibited technical studies and contradict the objectives and recommendations of the statutory framework that ought to be underpinning planning including the Implementation Plan itself.

The technical studies and exhibited documents highlight the fact that a decision to impose a maximum density cap to the subject site of only 35 dwellings per hectare, would result in poor planning outcomes for the community. A review of these reports show that the proposal currently exhibited, is not evidence-based.

The technical studies and exhibited documents in fact, provide support for increasing the density at the subject site as a priority, due to the benefits of transit-oriented development. It is noted that there is an increasing appetite for apartments close to amenities and transport. Transit-Oriented development is noted to achieve positive economic, social and environmental outcomes for future communities. The technical studies encourage higher densities at locations closed to major rail and transport networks, such as 72 Tallawong Rd, to ensure the benefits of investing billions into transport is brought to fruition.

The *NWGC Housing Market Needs Analysis*, points out there is already an increased demand for apartments close to train stations, which will be further driven by the completion of the Northwest Metro. One of the most salient points made by this expert study, commissioned by the Department of Planning, is the acknowledgement that **sites located close to train stations ought to be the logical priority for increased density**:

- “A great place to live with communities that are strong, healthy and well connected. A structural change in market preference and demand certainly **supports a case for a review and increase of current residential density levels, those precincts already benefiting from keen market interest and those focused around train stations are logical priorities for denser residential product.” (Page 57)**
- “An increasing dominance by units/flats and apartments is observed and this is **particularly notable around train stations and major transport nodes...** Key implications for housing demand are those of choice and affordability. It is therefore unsurprising that new buildings approvals indicate **a distinct shift in residential typologies away from separate houses to smaller and denser forms of dwellings.**” (Page 26)
- “Multi-unit living is perceived to be associated with a low maintenance and convenience lifestyle that is **accessible to a range of amenity and entertainment options.** Acknowledging that many people are drawn to multi-unit living for these lifestyle reasons, equally important are the issues of choice and affordability... Notwithstanding the factors of affordability and choice, **the completion of the NWRL is likely to also drive demand for smaller dwelling types,** attracting a different buyer profile (e.g. single and couple person households and those with no children) who would otherwise be attracted to separate/ detached housing in the NWGC...” (Page 33)
- “In the high growth scenario, an additional 77,868 dwellings are projected to be demanded by 2036. This exceeds the assessed market capacity (37,586 dwellings) and even the current theoretical capacity of 63,224 dwellings in NWGC. In all precincts, there is an argument for increasing permissible densities, not only to address market demand but to optimise services availability given that not all zoned land will be developed.” (Page 57)

*Priority Growth Areas: North West Growth Centre (NWGC) Housing Market Needs Analysis*; Department of Planning & Environment, Final Draft last saved 07/02/2017 – Esther Cheong, AEC Group ; Pages - 57,26,33,57.

The technical study – relating to Integrated Transport and Land Use Planning places a strong emphasis on transit-oriented development. This study was commissioned by the NSW Department of Planning and Environment and the Department of Transport and is referred to as:

*North West Priority Growth Area Structure Plan Review, Exhibition Draft Report - Integrated Transport + Land Use Planning; Department of Planning and Environment; Department of Transport; Jacobs; November 2016.*

This technical study underscores the important role Rouse Hill will play in Sydney's future, as it is a connecting point for major transport corridors (rail and road networks) by linking the Northwest Metro train line to the existing CityRail Network. The technical study stresses the importance of aligning development to maximize investment in transport to gain economic, social and environmental benefits for communities. This in turn provides further support for increasing density at the subject site at Rouse Hill located only 400 metres from the new Metro station and Schofields Rd.

Key examples of the study that support the subject site being zoned to a higher density:

- “Refinement of the current Structure Plan should look for opportunities to **boost residential densities** along the chosen route corridors (Schofields Road and Garfield Road) and **around proposed rail station locations (Cudgegong Road, Schofields, Riverstone and Marsden Park)**. This will support the transit service and encourage trips by public transport rather than private vehicle. (Page 40)
- “**Concentration of higher densities in corridors and centres least constrained by topography and most accessible to primary transport (road and transit).**” (Page 41)
- “SMN (Sydney Metro Northwest) will have a station located near Schofields Road between Cudgegong Road and Tallawong Road. SMN will connect NWPGA with key employment centres along the Global Economic Corridor including Rouse Hill, Norwest, Macquarie Park, Chatswood, and eventually St Leonards and Sydney CBD, by providing high frequency services with two- to three-minute headways using high capacity single deck services. The estimated travel time from Cudgegong Road to Chatswood will be in the order of 37 minutes, providing faster and more direct services for residents within the NWPGA. A rapid transit corridor defined by the Sydney Metro Northwest (SMN) through the centre of the NWPGA will respond to emerging nodes within the centre and adjoining areas. It will be a catalyst to accommodate future network infrastructure and in the longer term, rapid transit services will provide an additional, more powerful attractor for transit users as well as stimulating further development.” (Page 50)
- “The NWPGA will be an area of intense development growth over the next 30 years and is one of two priority growth areas identified in A Plan for Growing Sydney. The 2011 population within the NWPGA is approximately 29,000 persons. At full development the population in the NWPGA is expected to increase to approximately 260,000. While existing infrastructure will in some way serve this growth, improvement and expansion of the transport network will be required to effectively serve the access and mobility needs of this emerging area. **The key to managing this growth will be through a highly compact and connected urban, land use and transport framework focused at precincts and serviced by an integrated land use and transport system.**” (Page 74)
- “Achieve urban consolidation by promoting higher intensity land uses while simultaneously improving local amenity and viability of the local community.”

- “Focus on customers using public Transport;  
A key objective of the public transport network serving the NWPGA is to provide access for more people, more efficiently, on the available transport corridors. This reduces impacts on the traffic network, which is far less efficient in carrying high volumes of people within a constrained corridor. The key to achieving the required mode share to public transport is to understand and respond to the needs and expectations of the people that will (potentially) choose to use the public transport network. **This is a critical shift in thinking about transport planning: every decision and consideration needs to focus on the aim of attracting people to use public transport.**” (Page 86)
- “Providing transport supportive land use and urban form  
The relationship between development patterns within the NWPGA and transit is the **idea of proximity to transit. This is really the same issue as density, but viewed from the customer’s point of view.** Cervero’s findings in his paper “Ridership Impacts of Transit Focussed Development” (1993) are summarised below:
  - **Residents living near rail stations are 5 times more likely to commute by rail.**
  - Employees working near rail stations are 2.7 times more likely to commute by rail.” (Page 87)
- “Increase density around transport Infrastructure  
NWPGA offers excellent physical dimensions for transit-oriented development, or development in such a way that can effectively and efficiently provide access by public transport. Increasing the amount of employment and density around the transport network in the early years will bring a range of economic benefits to operators of the bus network (including the North-West Transitway) and the SMN. By providing a larger patronage catchment, it will be more viable to run transit at higher levels of service. This is critical to instill sustainable travel behaviour to, from and within the NWPGA, as well as promote transit oriented urban form within and around key centres. **It is crucial that residential densities are increased around transit infrastructure** particularly at Schofields, Marsden Park and Riverstone because:
  - It will result in a higher mode share to public transport, and a commensurate reduction in car use and dependence (and the range of associated economic, environmental and social impacts).
  - It will increase the viability and vitality of the commercial interests and community infrastructure in the study area.
  - It will improve the sustainability of the NWPG.” (Page 88)
- “Key strategic transport corridors and desire lines that have been identified include
  - Penrith to Rouse Hill via Marsden Park;
  - Rouse Hill to Castle Hill;
  - Parramatta to Rouse Hill;
  - Rouse Hill to WSA via WSPGA; and
  - Blacktown to Richmond via Marsden Park.” (Page 89)
  -
- “Travel behaviour – general travel behaviour of communities can best be influenced when they initially move to an area. If viable non-car based travel opportunities (transit, bike, walking) are available at the time of arrival to NWPGA, it is more likely that the community will make use of such opportunities.” (Page 91)

The listed intention of the *North West Priority Growth Area - North West Land Use and Infrastructure Implementation Plan May 2017*, (here the Implementation Plan), is to update the planning framework since the release of the *North West Growth Centre Structure Plan 2006* (the Structure Plan):



“It identifies the opportunities for future urban growth and recommends a planning pathway to realise the area’s potential. The Implementation Plan also builds on the framework set in the *draft West and West Central District Plans* released by the Greater Sydney Commission in late 2016.” (Page 3)

The proposal to cap the density on the subject site to only 35 dwellings per hectare is at odds with the stated objective of the Implementation plan. It does little to realise the area’s potential.

“Objectives for the North West Priority Growth Area” include:

1. To plan for an increased population in Sydney’s North West in vibrant and liveable neighbourhoods.
2. To balance the needs of a growing population with opportunities for employment and recreation
3. Improve transport accessibility and connectivity throughout the area
4. To facilitate the delivery of infrastructure that will support housing and employment growth
5. Identify and enhance key biodiversity areas, open spaces, riparian corridors and culturally sensitive areas
6. Explore new land uses along major infrastructure corridors to maximize public investment in infrastructure

The site should have its density increased significantly to at least the “Z” zoning (up to 100 dwellings per hectare) in order to deliver on the above objectives such as creating vibrant liveable areas that are well connected, with improved transport and connectivity. Doing so would result in the area’s potential being realised, in particular maximizing the positive returns possible from the public investment in the NorthWest Metro train line.

We hope that full consideration will be given to these submissions.

-End-