



**PLANNING AND INFRASTRUCTURE**  
Planning Unit

20 March 2024

Director Housing Delivery  
Housing Supply and Infrastructure  
Department of Planning, Housing and Infrastructure  
Locked Bag 5022,  
Parramatta NSW 2124  
Att: Meagan Kanaley

Dear Meagan,

**RE: Proposed Transport Oriented Development (TOD) State Environmental Planning Policy (SEPP) – Roseville Station (Tier 2)**

I am writing to you regarding the proposed Transport Oriented Development (TOD) State Environmental Planning Policy (SEPP), particularly with respect to Roseville Station.

It is Council's understanding that the proposed SEPP will amend planning controls within 400m of thirty-one metro and rail stations. The changes will allow:

- Residential flat buildings in all residential zones (R1, R2, R3 and R4) within 400 m of identified stations
- Residential flat buildings and shop top housing in local and commercial centres (E1 and E2) within 400 m of identified stations.

Department of Planning Housing and Infrastructure staff provided a briefing to Willoughby Councillors on 19 February 2024, and a briefing to Willoughby strategic planning staff on 14 March 2024. It is understood that the SEPP is to be finalised in March and commence in April 2024.

None of the thirty-one metro and rail stations are located within the City of Willoughby. However the 400m radius from Roseville Station in the Ku Ring Gai Council area crosses into the City of Willoughby, impacting approximately four properties.

Council considers it unnecessary and counter-productive to apply the 400m radius to the (approximately) four properties within the Willoughby LGA. While Council acknowledges the need to focus housing around well serviced stations, the properties in question do not meet this requirement. The four properties are not well connected to Roseville station and are serviced by a highly constrained local road network.

Significant strategic planning work has been undertaken by Willoughby Council in recent years to exceed our housing targets and accommodate growth in a manner accepted by the community and the Department. This includes delivering additional capacity for approximately 6,500 dwellings in Chatswood CBD and other local centres through our recent Comprehensive LEP (implemented in June 2023). Council's current focus is working to deliver planning proposals for a further 400 dwellings and to continue to

progress the development applications arising from these recent changes. Including the approximately four properties will unnecessarily divert resources from these higher yield activities, which are already delivering housing well in excess of our current housing targets.

To ensure resources are focused on efficient delivery of capacity and housing, it is strongly recommended that the properties in question be excluded from the Roseville Station TOD by specifying the application of the SEPP to be for the area 400m around Roseville station “*within the Ku Ring Gai LGA*”. Indeed, for clarity and consistency, it is recommended that SEPP specify the LGAs impacted for each station in the wording of the SEPP.

Notwithstanding the above, Council also notes that the proposed height and FSR controls appear to be mismatched and will should be reviewed prior to implementation. Council also notes that reliance on the ADG is proposed to guide the built form; Council recommends a review of the ADG or the development of supplementary materials to ensure higher quality outcomes. Council is supportive of establishing parking maximums around stations, and the SEPP offers an opportunity for parking rates to be significantly reduced to manage congestion and improve mode splits. It is also recommended that the *Guide to Traffic Generating Developments* is updated to ensure consistent application of this approach across State policies.

A map of the Roseville Station TOD, as well as more detailed comments, are provided in Attachment 1.

Should you have any question in regards this letter and the attached, please contact Craig O'Brien – Acting Team Leader Strategic Planning on (02) 9777 7647.

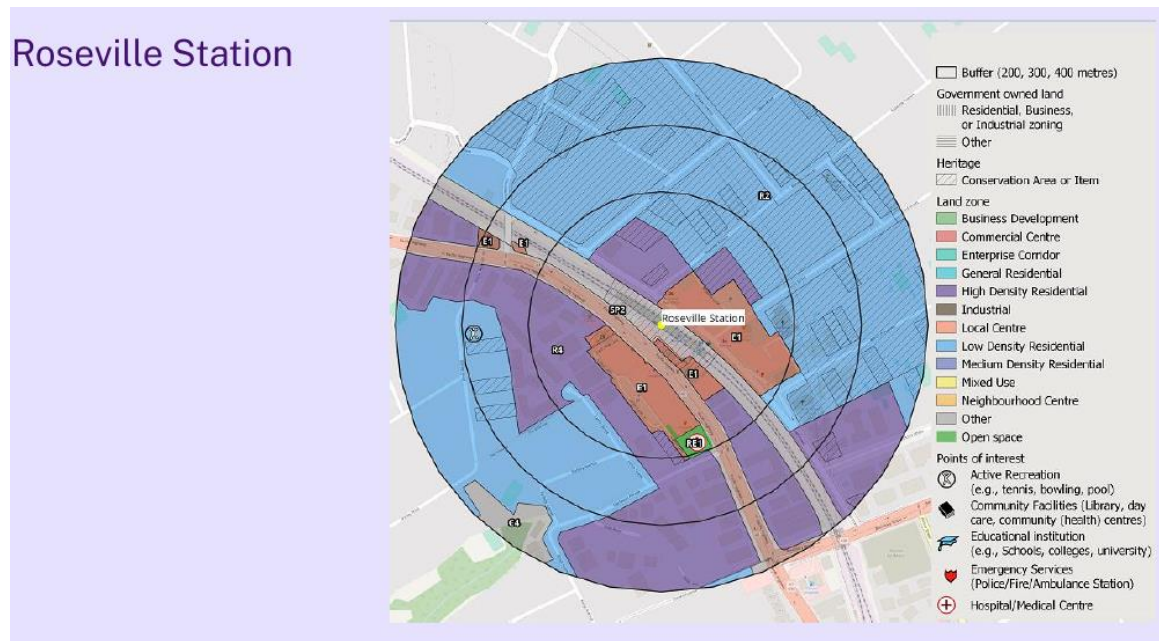
Yours sincerely,



Dyalan Govender  
Acting Head of Planning

# Attachment 1

## TOD SEPP Stations



## Issues

### Lack of consultation with Willoughby Council

Consultation with Willoughby Council has been minimal, with no consultation in January and February 2024 and a briefing provided on 14 March 2024.

### Appropriateness of the 400m radius, around Roseville Station, into Willoughby Council

By applying an unrefined 400m radius, the reforms will capture approximately four properties in the Willoughby LGA that are extremely unlikely to offer significant yield via a Master planning process. Council strongly recommends excluding these properties in the Willoughby LGA from the TOD program. Council supports the need for a master planning process to set the future vision and capacity around Roseville station, however, this should be focused on those areas closer to and better connected to the station. Including the Willoughby LGA merely due to a bureaucratic application of a generic numeric approach is poor and inefficient planning, that could easily be avoided in the drafting of the SEPP.

## **Four properties are not required by Willoughby Council to meet housing targets**

Willoughby Council is on track to significantly exceed its housing target, having recently implemented changes to increase capacity in locations supported by infrastructure services, particularly the Chatswood CBD, St Leonards, Artarmon, North Willoughby, Naremburn, Castlecrag, Northbridge, Penshurst Street, Willoughby and Willoughby South. This means Willoughby is uniquely well placed to accommodate the soon to be released housing targets arising from the National Housing Accord.

Moreover, Council is not merely creating theoretical capacity, we are also working with landowners and developers to deliver approvals. Since 2021, we have approved over 4,500 dwellings. In the Chatswood CBD alone, Council is currently assessing development applications that, if approved, would yield over 1,000 additional dwellings.

Including Willoughby LGA in the Roseville Station TOD for approximately four properties of minimal uplift potential will unnecessarily divert resources from higher yield and more strategically valuable areas of housing delivery and is it strongly recommended that Willoughby LGA be excluded from the Roseville Station TOD, which could easily be implemented by specifying the application of the SEPP to be for the area 400m around Roseville station "*within the Ku Ring Gai LGA*". Indeed, for clarity, is recommended that SEPP specify the LGAs impacted for each station.

## **Other issues with wider proposed TOD reforms**

With respect to the wider proposed reforms, Council is supportive of setting lower parking maximum rates, this should also be supported by a review of the Guide for Traffic Generating Developments, which is out of date and commonly used by applicants to seek variations of parking controls. Council also notes that the proposed height and FSR appears to be mismatched and should be revised to make sure the FSR is more consistent with the proposed height control. Finally, Council also recommends that improved design standards be implemented with the SEPP; the intended reliance on the ADG is not supported as the design outcomes under the ADG have been mixed at best.