

Submission  
No 49

## INQUIRY INTO PROPOSAL TO DEVELOP ROSEHILL RACECOURSE

**Organisation:** Urban Development Institute of Australia NSW

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17 July 2024

The Hon. Scot Farlow MLC  
Chair  
Select Committee on the Proposal to Develop Rosehill Racecourse  
NSW Parliament  
Macquarie Street  
Sydney NSW 2000

Dear Mr Farlow,

The Urban Development Institute of Australia NSW (UDIA) is the state's leading development industry body. We represent leading participants in the industry and have more than 450 members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, consultants, academics and state and local government bodies.

UDIA invests in evidence-based research that informs our advocacy to state, federal and local government, so that development policies and critical investment are directed to where they are needed the most. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers. In NSW alone, the property industry creates more than \$581.4 billion in flow on activity, generates around 387,000 jobs and provides around \$61.7 billion in wages and salaries to workers and their families.

UDIA welcomes the opportunity to make a submission to this select Committee Inquiry. We note the Committee's terms of reference focus largely on the process leading to, and around, the signing of a memorandum of understanding between the Australian Turf Club and NSW Government and the subsequent unsolicited proposal received by Government for the relocation of the Rosehill Racecourse and resultant re-development opportunities this would create in the precinct.

UDIA supports the Government's intention to greatly increase new housing in this precinct beyond what is contemplated by the current Place Strategy. Within this submission we have however limited our comments to the benefits and opportunities presented as a result of the urban renewal of Rosehill-Camellia precinct that we believe could only be sensibly achieved through the delivery of a new Metro Station near the Rosehill Gardens Racecourse to support the increased population.

### **Background to the expansion of the need for greater station density along the Metro West project**

Inadequate public transport is evident across Western Sydney, with on average one rail station per 30,000 people in Western Sydney, compared to one for every 15,000 people in the Eastern suburbs. Historically NSW has not taken full advantage of city shaping opportunities for key transport infrastructure in Greater Sydney, instead it has focused on siloed business cases for transport with a focus on travel time savings e.g. 20 minutes travel time between Point A and Point B.

The current Transport approach typically results in fewer stations, which generate additional dwell times, and favour travel time objectives over place creation. This has occurred with the Western Sydney Metro which has large distances between stations including a 7km alignment planned between the Olympic Park and Parramatta stations with no station. UDIA's research shows based on global comparisons, this gap is likely to be among the largest anywhere in the developed world.

UDIA commissioned Professor David Levinson from University of Sydney to produce the [\*\*'Governing for Access' Report\*\*](#) the general theme of which is that rather than the historic approach of only focus on time savings, we should be planning our transport around accessibility (to other people, places, housing, jobs etc) – a Cities within Cities approach.

This would lead to Sydney becoming a more desirable and convenient global city with the following positive outcomes:

- shorter commute lengths
- greater public and active transport mode shares
- higher employment and incomes
- greater productivity.

As part of that work, Professor Levinson undertook an audit of the existing and proposed Metro lines which suggest the plans for Sydney are far behind what is considered international best practice in building automated rail systems, particularly with respect to the average distance between each station. Sydney’s planning of Metro lines is less than half as efficient as global comparators like Tokyo and New York. Under a more globally comparative alignment, Sydney theoretically could have constructed up to 57 additional stations on top of the 46 total Metro stations that are either planned or have been built.

<b>Global Metro Comparisons</b>	<b>Sydney (current + proposed)</b>	<b>London</b>	<b>Shanghai</b>	<b>Tokyo</b>	<b>New York</b>
<i>Number of Metro Lines</i>	4	11	19	9	36
<i>Number of Metro Stations</i>	46	272	408	180	424
<i>Total System Length</i>	113km	402km	802km	195km	399km
<i>Rail Length per Metro Station</i>	2.5km	1.5km	2.0km	1.1km	1.1km

Source: UDIA NSW/Professor David Levinson

Of 33 Metro Stations being built over the next two to seven years in Sydney, our audit revealed that 29 either do not include, or have a very low portion considered, for residential over-station developments. This concerning trend has been onset by now outdated Station Design and Precinct Plans (SDPPs) and political pressures significantly reducing the scope for residential development near these stations over the last half decade.

Against this backdrop, UDIA has consistently advocated for a greater number of stations to be included in planned heavy rail projects, including on the Metro West project. In particular **we have advocated for two additional stations to be built in the 7-kilometre gap between Sydney Olympic Park and Parramatta** metro stations along the planned Metro West alignment.

UDIA welcomed the Government's announcement in December 2023 that it would direct Sydney Metro to complete scoping studies for up to 2 new stations to be constructed west of Sydney Olympic Park, along the existing planned route.

### **The benefits of a Metro Station at Rosehill-Camellia**

UDIA's research, together with our extensive work over many years with industry leaders and key landowners advocating for a station at the Rosehill-Camellia precinct, which has planning in place for a light rail station and Town Centre that could easily be increased to a Metro Station site without major cost impacts and would both attract more people to the area and improve their lives.

UDIA's 2020 submission on the Sydney Metro West Environmental Impact Statement recommended Government provide a Metro Station at Rosehill-Camellia and at least one other station on the route to maximise public transport access to the growth precinct and unlock new housing.

At 1.6kms from Parramatta, it provides the ideal location for Parramatta's medium-term growth and the opportunity to really extend the River City exposure. It does not extend the length of the tunnel, avoids the need for an evacuation safety exit because of the current 7km distance to Homebush and it will alleviate demand pressures at Parramatta.

### **A Missed Opportunity**

The absence of metro stations along this corridor under the current alignment represents a missed opportunity to make a positive economic contribution to accommodating growth within the Central City and leverage the potential for value creation to both the Government and the economy.

A metro station at Rosehill-Camellia has been supported by detailed submissions at every step in the process to date. It enjoys strong support from the Lord Mayor and City of Parramatta, the local state member, all leading industry associations, major landowners within the precinct and the adjacent Western Sydney University Campus.

A metro station located at, or in close proximity to Camellia Town Centre provides a catalyst for major urban renewal of an under-utilised former industrial site where the

underlying land is heavily contaminated and is unlikely to be remediated in the absence of the significant economic uplift provided by this scale of urban renewal.

A Metro station would help realise the potential benefits for the growth of the Central River City, over the medium to long term. Importantly, the lack of adjacent residents can also limit objections to density. Consequently, it provides great scope for rezoning resulting in a significant uplift in employment and housing supply within the Camellia Town Centre to support future growth and deliver additional much-needed housing in the centre of metropolitan Sydney.

### **Delivering a Metro Station at Rosehill-Camellia is possible without the use of Rosehill Racecourse for housing**

The existing Rosehill-Camellia Place Strategy which was finalised in March 2022 has already confirmed the capacity of the precinct to support up to 10,000 new homes utilising a planned light stop at Camellia.

Using our market leading 'Urban Pinboard' platform, UDIA has been able to confirm the delivery of a Metro Station at Rosehill-Camellia could support the delivery of up to 20,000 new homes and more than 10,000 jobs in a next generation Transport Oriented Development mini-city. This mini city would utilize existing private landholdings and would not require the use of lands owned by the Australian Turf Club at Rosehill Gardens Racecourse. This volume of new housing and resultant population would underpin the feasibility of a new Metro Station at Rosehill-Camellia, without the need to use the Rosehill Gardens site.

The further inclusion of some of curtilage lands at the ATC site such as carparks and non-racing areas and the use of 3 to 4 additional private landholdings east of Rosehill Gardens could see this total number of dwellings exceed 30,000.

As we have outlined above, there are several scenarios where 20,000 homes or more could be delivered and racing still continue at Rosehill Gardens. These scenarios would not be viable with the existing transport capacity to be delivered by the Camellia light rail station. As such, **we strongly recommend the NSW Government commit to delivering a new Metro Rail Station at Rosehill-Camellia regardless of the outcome of the unsolicited proposal process which is currently under way.**

For the avoidance of any doubt, UDIA NSW does not have a view about the merits of relocation of racing from Rosehill Gardens, nor are we advocating for or against the

successful progression of the Unsolicited Proposal process that has been submitted by the Australian Turf Club. As we have indicated above, we believe it is Important the Committee and wider community is aware of underlying housing potential of the Rosehill-Camelia precinct which could be unlocked regardless of if the proposal succeeds or not and the need for the Investment In a metro station in the precinct to achieve this outcome.

This investment should not be linked to the success or otherwise of the Unsolicited Proposal; without it the future of this precinct to deliver a once-in-a-generation urban renewal process will be lost

We would like to thank the Committee for taking the time to consider our submission.

Please reach out to **Executive Director – Policy and Strategy,**

if you would like to discuss the matters

raised in our submission further.

Kind regards,

**Stuart Ayres**  
**Chief Executive Officer,**  
**UDIA NSW**