Homes for All:
Social and Affordable Housing Opportunities Around Train Stations

5 February 2024

The opinion of Ross Gittins

Housing is becoming hereditary. Young people can afford to buy a home only with help from their parents, but parents can help only if they're well-established home owners. Without so much help from parents, home prices would have to fall to make homes affordable.

…Until now, the problem of 'housing affordability' has been seen as a problem for would-be home owners. Last week, the focus shifted to rent affordability and the poor treatment often dished out to renters.

Ross Gittins, *Sydney Morning Herald*, 23 August 2023.

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About the author

Dr Gary Cox is an urban planner and housing policy expert. He has a long association with Shelter NSW going back 30 years. Notably he was a lead author for the influential study on the Olympics and housing which highlighted potential negative housing impacts from six previous major events worldwide (Cox, Darcy and Bounds 1994).

Gary has spent nearly two decades working in London since 2002, working for the Mayor of London Ken Livingstone, the UK Prime Minister Gordon Brown, and leading on the delivery of large scale urban regeneration projects.

He was the London Development Agency's Strategy Development Advisor for Transport and had a wide remit including the congestion charge scheme, Crossrail, the East London Line Extension, and a number of tram line developments. He was the lead author of the NSW Long Term Transport Master Plan Discussion Paper (Transport for NSW 2012). He is a member of the Advisory Board of the Henry Halloran Research Trust at the University of Sydney.

Acknowledgements

Abbreviations

ASD	Adjacent site development
E1	Local Centre Zone which only permits boarding houses and shop top housing
E2	Commercial Centre Zone which does not permit any residential uses
ISD	Integrated station development
OSD	Over-station development
R1	General Residential Zone which permits all types of housing including flat buildings
R2	Low Density Residential Zone which only permits single dwelling houses and group homes
R3	Medium Density Residential Zone which permits attached dwellings and multi- dwelling housing
R4	High Density Residential Zone which permits residential flat buildings and shop top housing
RIO	Rail infill opportunity
SEPP	State Environmental Planning Policy
TAHE	Transport Asset Holding Entity
TOD	Transport Oriented Development

Definitions

Affordable housing/ affordable rental housing

Housing that households on very low to moderate income can afford, as defined in *State Environment Planning Policy (Housing) 2021 s.13(1)(a)*, as:

(a) the household—

(i) has a gross income within the following ranges of percentages of the median household income for Greater Sydney or the Rest of NSW—

(A) very low income household—less than 50 per cent,

(B) low income household—50–less than 80 per cent,

(C) moderate income household—80–120 per cent, and

(ii) pays no more than 30 per cent of the gross income in rent.

1   What is the aim of this discussion paper?

A view from the BBC

At the end of December 2023, BBC News reflected on 'the year the Australian Dream died' (Turnbull 2023). The news report observed that underpinning this situation was the fact that buying a house is now astronomically expensive in Australia. The average property now costs about nine times an ordinary household's income, triple what it was 25 years ago.

The BBC announced that Sydney is the second least affordable city on earth to buy a property, trailing only Hong Kong, according to the 2023 Demographia International Housing Affordability Survey.[1] Put very starkly, Australia has made home ownership virtually unattainable for almost anyone without family wealth.

Added to this is a profound slow-down in new housing supply and a pronounced reduction in annual new housing construction. Taken together this is a perfect storm for a housing crisis.

Shelter NSW's Policy Platform

At Shelter NSW, our overriding view is that the combination of housing policies from all levels of government has produced persistently negative results for the people of NSW, but especially for those in the lowest 40 per cent of income earners.

We are concerned about chronic and rising trends in homelessness, housing rental stress and insecurity as well as the impacts of poor quality and poorly designed housing, particularly on low income households.

Over three quarters of lower income renters in NSW are paying unaffordable rents. This figure rises to 92 per cent for very low income renters in Sydney. Lower cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage in the least accessible locations have been created across our major cities as low income households are displaced.

The NSW rental market is failing, forcing our most vulnerable citizens to go without essentials as well as contending with insecure tenancies. Added to this climate change is disproportionately impacting on lower income households without the means to afford adaptation measures. This adds up to more pressure on vulnerable households' cost of living pressures.

This discussion paper is a timely contribution to the current public policy debate around how most effectively to increase the supply of new housing in the Greater Sydney Region as well as major urban centres in the regions.

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[1] According to this research, Sydney was ranked 93 out of a total of 94 cities around the world on housing affordability (with Hong Kong, ranked 94, being the worst). See Urban Reform Institute 2023.

A focus on social and affordable housing – homes for all

The second half of 2023 witnessed what the Planning Institute of Australia termed 'an advent calendar of housing announcements' by the NSW Government (PIA 2023).

These announcements are focussed on interventions around train stations to change zoning designations to permit higher density residential development. These proposals are based on the principles of transport oriented development that aim to promote higher densities around well- located transport hubs.

Shelter NSW broadly supports the NSW Government's housing and planning proposals.

However, we think that the government can and should do more to deliver specifically social and affordable housing.

Shelter NSW's view is that NSW Government agencies and local government need to have a clear focus on delivery with bold targets and mechanisms in place that will assist with projects getting off the ground. Ultimately, Shelter NSW wants to see housing delivered at pace with guarantees that a significant proportion of new housing will be affordable to those on very low, low, and moderate incomes.

The analysis in the discussion paper has been informed by a desktop review of all the stations in the Sydney rail network. This exercise has been undertaken primarily to consider whether there are opportunities on the government's own land holdings to deliver social and affordable housing in the short to medium term. It also responds to the current NSW Government reforms to support additional housing supply adjacent to transport infrastructure.

Shelter NSW believes that in order to achieve these outcomes further measures will need to be taken. This will be the subject of the discussion paper's recommendations to the NSW Government at the end of this report.

Our areas of focus for the discussion paper

1. *Shelter NSW supports the NSW Government's Transport Oriented Development Program as announced on 7 December 2023. However, we believe that it can and should go further.*

2. *Shelter NSW's research into land use controls and land holdings around train and Metro stations in the Sydney rail network indicates that there may be opportunities to redevelop government owned land for housing – particularly social and affordable housing.*

3. *Shelter NSW believes that to achieve our overall aim of 'a secure home for all', there needs to be a strong focus on delivering social and affordable housing in the NSW Government's Transport Oriented Development Program. We believe that essential workers in a broad range of occupational groups should be an initial target group.*

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4. *Shelter NSW is of the view that to achieve these shared responsibilities and objectives, there needs to be a robust monitoring and management system in place to track housing completions and to highlight obstacles to delivery. This must be more than just a simple form filling reporting system.*

5. *Finally, Shelter NSW believes that only a broad partnership approach between state agencies, local government, the community housing sector, and the private sector will enable the successful achievement of the NSW Government's housing supply objectives.*

6. *Taken together, Shelter NSW believes that these policy and program directions can deliver more housing in the Greater Sydney Region and beyond that meets the diverse needs of our communities and addresses the urgent need to supply more social and affordable housing.*

2   What is the housing problem in NSW?

A widespread housing crisis in Australia

There is shared understanding in Australia amongst our politicians, the media, policy commentators and the community sector that there is a housing crisis. This is not confined to a particular state or region. It is extensive all over Australia. It is especially pronounced in NSW.

Recent key indicators quoted by the NSW Government and the media show the extent of the current problem.

Today's housing crisis – tomorrows housing challenge

The Big Picture

The housing supply shortfall is behind Sydney **unit rents increasing by 24 per cent** over the year to the end of September 2023, along with **house rents lifting by 11 per cent**.

Back in the early 1980s, the average house in Sydney cost $78,900, or about 5 times a full-time average wage. Now, the price of a typical Sydney house is 17 times more expensive and is **14 times the average income**.

Media Release: NSW Premier and the NSW Minister for Planning and Public Spaces 2023.

A housing market 'rebound'

Sydney's median house price has reached a new peak of **$1.6 million** and is tipped to rise further as potential buyers are set to benefit from cuts to interest rates and taxes.

The city's property market has rebounded from its downturn and a typical house now costs about
$6000 more than during the previous peak in the March quarter of 2022.

Sydney Morning Herald – Domain, 24 January 2024.

Shelter NSW's contention is that without intervention at all levels of government – federal, state, and local – this problem with not be solved. In all likelihood it will get worse. This will affect the most vulnerable and disadvantaged in our community the severest.

We will need to deliver over 45,000 new homes each year in NSW

Housing policy is often expressed in simple terms relating to supply and demand. Primarily, demand for housing arises from population growth. This comprises a mix of natural increase in the current population but also increases from net migration.

The NSW Government estimates that by 2041 the state will have a population of 9.87 million people. This is up from 8.17 million in 2021. Greater Sydney's population will grow to

approximately 6.1 million by 2041. This is an increase of over a million more people than currently live here at present. Overall, NSW is expected to grow on average by over 85,000 people each year until 2041. All these people will need somewhere to live (NSW Department of Planning & Environment 2022a).

The NSW Government estimates that an additional 904,000 new homes will be needed over the next 20 years to accommodate this growing population. This translates to 45,200 new homes per year: 28,500 in Greater Sydney and 16,700 in regional NSW (NSW Department of Planning & Environment 2022b).

Delivering 45,000 new homes each and every year over the next 20 years is a tall order. Shelter NSW believes that the private development and house building market alone will not be able to meet this level of demand. There is a clear and unambiguous role for government to ensure these housing supply targets are met.

Is current new housing supply meeting the challenge?

The graph below shows housing completions in NSW over the period 2003 to 2023. It is often more useful to look at long-term trends rather than picking out a single favourable statistic. Housing completions and commencement are highly cyclical as the graph demonstrates. This graph shows that the decline in approvals and completions set in prior to Covid-19 and continues to the present, with an uptick in approvals more recently.

The NSW Department of Planning and Environment's analysis indicates that for Greater Sydney the trend over the past 30 years averages at around 30,000 dwellings a year. In the past decade this increased to around 42,600 a year on average. But in 2021–22, there were only 35,800 housing construction approvals and 24,600 completions. For regional NSW, construction approvals averaged 18,300 dwellings a year over the past 5 years. Housing construction approvals reached 19,200 in 2021–22. NSW generally has lower completion numbers than Victoria, despite its lower population.

Housing construction approvals and completions in NSW
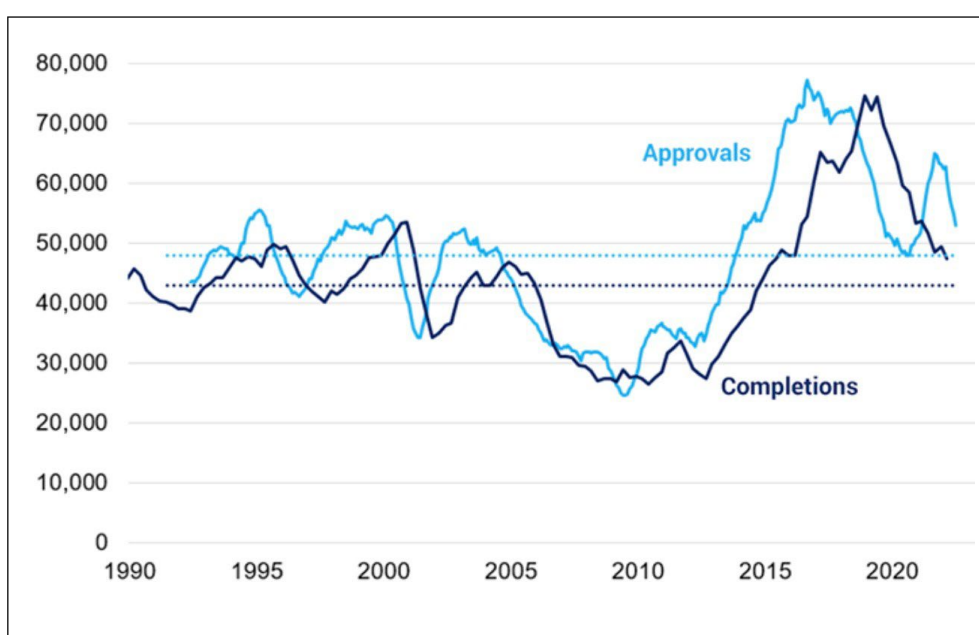
Source: Australian Bureau of Statistics 2023, NSW Department of Planning & Environment 2022c.

To meet the year on year NSW Government housing targets, approvals and completions need to exceed these housing supply targets to ensure sufficient supply in years with decreased completions. Shelter NSW's view is that the focus should be on a 'strong and steady' pipeline in housing delivery. However, the total numbers only address part of the housing crisis. There is a crisis in affordability. This is particularly acute in the private rental market.

The NSW housing supply data seems to confound the accepted wisdom in simple economic supply and demand theory – that increased prices will lead to increased supply. Supply is not keeping up with demand. As the NSW Government admits in its own media release (NSW Premier and the NSW Minister for Planning and Public Spaces 2023):

> *Despite NSW having the largest population, the largest expected increase in population, the highest rents and the highest medium house prices, NSW is last on the east coast when it comes to housing completions.*

Housing is about people not numbers – the affordability challenge

National Shelter is a partner along with Beyond Bank and the Brotherhood of St Laurence, in SGS Economics and Planning's self-funded research project (SGS Economics & Planning 2023). This research project produces the annual rental affordability index. This project started in 2015 and is designed to benchmark rental affordability trends in each state and capital city around Australia.

The annual rental affordability index report presents the data in an easy to understand format. Most importantly, it examines the impact of changes in private rentals on typical disadvantaged households. Overall, the data shows that Greater Sydney is the least affordable capital city in Australia, followed by Greater Hobart which has in fact improved slightly from the previous year.

The SGS report profiles ten different low to moderate income household types to demonstrate the rental situation for different income groups, age demographics and household compositions in Australia. The analysis is based on a typical household income and an indicative bedroom sized home. It provides a significant insight into the effect of housing affordability crisis on the lives of people in our community. The findings highlight the severity of the cost of living pressures, fuelled by historically high private rent levels and extremely low vacancy rates.

It is generally accepted that if housing costs exceed 30 per cent of a low income household's gross income, the household is experiencing housing stress (Australian Institute of Health and Welfare 2020). At this level, housing is unaffordable and housing costs consume a disproportionately high amount of household income. This inevitably means that the remainder of the household's income has to stretch further. This becomes a major problem if a household has a low basic income and has significant costs associated with caring, disability, or childcare. A housing crisis all too often leads to a personal crisis.

The results of SGS Economics and Planning's household analysis are shown in the following table. The five affordability categories relate to the amount a household pays in rent and the relative affordability level for that household:
- 60 per cent or more – extremely unaffordable rents

- 38-60 per cent – severely unaffordable rents
- 30-38 per cent – unaffordable rents
- 25-30 per cent – moderately unaffordable rents
- Less than 25 per cent – acceptable / affordable rents.

Private rental housing affordability: Greater Sydney 2023

Household Type	Bedrooms	Income	Rent as share of income	Relative affordability
Single person on JobSeeker	1 bed	$22,100	137%	Extremely unaffordable
Single pensioner	1 bed	$36,700	82%	Extremely unaffordable
Single part-time worker parent on benefits	2 bed	$44,800	76%	Extremely unaffordable
Pensioner couple	2 bed	$54,300	58%	Severely unaffordable
Hospitality worker	1 bed	$62,800	43%	Severely unaffordable
Student shared house	3 bed	$84,800	42%	Severely unaffordable
Minimum wage couple	2 bed	$91,800	37%	Unaffordable
Single income couple with children	3 bed	$104,500	33%	Unaffordable
Single full-time working parent	2 bed	$104,500	32%	Unaffordable
Dual income couple with children	3 bed	$209,000	17%	Affordable

Source: SGS Economics & Planning 2023.

The analysis highlighted in the table paints a stark picture. Only the dual income household has an affordable rent. The analysis shows that those on benefits or JobSeeker Payment, pensioners, and single parents are finding it tough. In all the categories, except hospitality workers, households are under more housing stress than in any other capital city.

Shelter NSW's key finding is that increasing supply alone will not alleviate the housing stress of these households in Greater Sydney. Increased social and affordable housing will need to be delivered over the next five years for us to have any chance of redressing this housing stress picture.

The findings of this section pose a number of questions. These are shown in the following box.

Discussion questions on the housing problem in NSW

Is a market approach to housing supply likely to succeed in the short to medium term?

What strategies and measures should be put in place to ensure a diversity of housing is delivered for households most in housing stress – particularly in the private rental sector?

Following the rental affordability index findings, what groups in the community should be the focus of delivering diverse, inclusive and affordable rental housing?

3 What is transport oriented development?

A simple concept – more housing around stations

Transport oriented development, or transit oriented development as it is called in North America, is not a new concept in urban planning. And it's not a new concept in Sydney metropolitan planning.

Calthorpe (1993) first used the term 'transit-oriented development' to denote the development of walkable, pedestrian friendly precincts centred on public transport hubs. These hubs could be railway stations, bus interchanges or light rail intersections. Different planning experts in various countries see the physical characteristics of transport oriented development rather differently. But the basic features include higher densities near the transport node (residential or commercial) – possibly within a 500 metre to 800 metre radius of the station entrance.

The Sydney Region Outline Plan produced by the NSW State Planning Authority in 1968 was based on a simple principle. This was that major new urban development should proceed along the existing rail network. The idea was to capitalise on existing rail infrastructure that would reduce the dominance of the radial arterial road system. To support this, strong suburban centres would be encouraged along the main rail lines to act as 'counter-magnets' to the Sydney CBD (Spearritt & DeMarco 1988).

To most people, transport oriented development is an obvious concept. For others, such as essential workers, being near to a railway station is an immediate benefit to access work and retail opportunities. Planners adopt the policy often out of a desire to reduce the need for people to travel by car, with all the many benefits that brings.

Transport oriented development has led urban and transport planners to development the PTAL Index. PTAL stands for Public Transport Accessibility Level. This is a scale from 0 to 6 – with the highest value representing the best connectivity.

The NSW Government's announcements are based around these basic principles of transport oriented development. Shelter NSW supports this approach, but the focus of this discussion paper is to suggest that more can be done to promote social and affordable housing through better use of government land holdings and a more proactive approach to affordable housing inclusionary zoning.[2]

Benefits of increased housing around stations

In April 2022, Committee for Sydney published a ground-breaking report called *Rethinking Station Precincts*. This report extended the urban planning discussion on transport oriented development to consider practical issues of delivery, place-making and the wider benefits of concentrating growth near stations. Importantly, the report provides a summary of the benefits that include: quality of life and social benefits, benefits to employment and business, and benefits for building more resilient communities.

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[2] Inclusionary zoning is a planning policy that requires that a number of affordable homes (or an equivalent financial contribution) are included in developments as a condition of planning approv

The following box highlights these 'co-benefits' of transport oriented development which includes benefits for residents, workers, industry and government.

Benefits of transport oriented development		
Benefits for residents	**Benefits for workers**	**Benefits for resilience**
• Higher quality of life, better places to live, stronger communities • Faster, more reliable access to Greater Sydney • Increase in affordable, accessible and diverse housing for residents.	• Less time commuting • Better access to jobs for more people • Improved mental health, with more personal time.	• More sustainable — less car dependency, with lower emissions • Greener — concentrating density preserves nature at the edge of the city.
Benefits for government	**Benefits for public transport**	**Benefits for industry**
• Increased economic return on public infrastructure investment • Improved labour productivity drives higher GDP • Improved social and public outcomes in precincts • More efficient public service provision.	• Increased ridership and fare box revenue • Higher asset values due to increased patronage.	• Improved access to talent (for employers) • More reliable customers (for retailers) • More investment opportunities (for investors /developers) • Agglomeration benefits of intensification (for industries).

Source: Committee for Sydney 2022.

Station precincts as preferred locations for new housing

In April 2023, KPMG in Australia published an important report (KPMG 2023). The report is called *Station Nation,* and its unambiguous finding is that train lines now dictate the location of new housing supply in Australia's four largest metropolitan areas.

The research found that 35 per cent of the 1.5 million new homes built in Sydney, Melbourne, Brisbane, and Perth between 2006 and 2021 were within a kilometre of a train station. The data showed that this was not a new trend and has been steadily increasing since 2006.

In Greater Sydney this effect was more pronounced. Nearly half of all new dwellings were built within close proximity to a train station. The headline findings from *Station Nation* are shown in the following box.

Headline findings of *Station Nation* for the Greater Sydney Region (KPMG 2023)

Out of **430,000** additional dwellings built between 2006 and 2021, **49 per cent** were located within one kilometre of a train station.

The strongest trend was seen in Greater Sydney between 2016 and 2021, with almost **110,000** new dwellings constructed within the one kilometre radius of a train station compared with less than **60,000** in the previous five year period.

Source: KPMG 2023.

In the four capital cities, within one kilometre of a train station, 65 per cent of new homes were apartments, 24 per cent semi-detached and 12 per cent detached. This is compared to the overall mix of dwellings in these cities of 31 per cent apartments, 23 per cent semi-detached and 46 per cent detached.

There is a commonly held perception in the community that increasing housing density around stations inevitably means high density residential tower blocks. The KPMG research found that these transport oriented housing developments included a mix of dwelling types. These housing developments around stations were observed not only in the CBDs and the inner city, but in middle ring and greenfield growth areas as well.

The key question around transport oriented development is how to enable better outcomes that deliver on a range of social outcomes – not just housing numbers. It's a planning process that is market driven but needs to be supported by community infrastructure, walking and cycling facilities, as well as place-making initiatives.

Delivery issues with transport oriented development

A major study of implementation issues in transport oriented development was conducted by Professor Glen Searle and colleagues from the University of Queensland (Searle, Darchen & Huston 2014). The study examined real life examples of transport oriented development in Australian cities: namely Wolli Creek in Sydney, Footscray in Melbourne, and Yeerongpilly in Brisbane. The study came up with a series of practical implementation measures to ensure that the objectives of these precincts were met, and the development targets were achieved. The study focussed on governance arrangements, partnerships and vision.

Some of the main delivery issues that the researchers identified were:
- The need for good governance arrangements to ensure delivery, as well as strong local leadership.
- Effective partnerships were necessary with the state agencies / transport agencies.
- Land amalgamation was important for larger sites to ensure targets were met.
- The three precincts all required detailed masterplanning that included a strong vision and clarity of objectives.

Finally, the study identified the most critical success factor for the success of these precincts. This was the importance of proactive state government measures to facilitate development approvals.

The findings of this section lead us to pose a number of questions. These are shown in the following box.

Discussion questions on transport oriented development

Is the NSW Government's approach to focus on train and Metro stations the right one?

How does social and affordable housing fit into transport oriented development? And should the NSW Government proposals focus more on diverse housing?

How much does achieving transport oriented development depend on the right planning policies and how much on effective delivery mechanisms?

Should housing around stations be targeted to those who need to use public transport for work – such as essential workers?

What other benefits from transport oriented development could be achieved?

4   Rethinking the role of station precincts

Rethinking station precincts

This Shelter NSW discussion paper has taken its inspiration from Committee for Sydney's ground- breaking report *Rethinking Station Precincts* (Committee for Sydney 2022).

The starting point of Committee for Sydney's research is the metropolitan rail network of Sydney Trains and Sydney Metro[3]. This is recognised as one of the state's most important urban assets. This is an asset that will grow to 338 stations across the state when the current round of funded projects is complete.

It is acknowledged that development of rail station precincts is a complex and difficult task. These precincts are typically located in existing CBDs and town centres, with fragmented landholdings. Any future development must balance the needs of existing residents and future communities.
However, if carefully and sensitively managed, a powerful network of station precincts can be created that support a 'polycentric' growth model for Sydney. This will avoid the urban sprawl that has characterised the growth of Australian cites in the past.

The *Rethinking Station Precincts* report accepts that Sydney will continue to have greenfield development. The report's analysis concludes that, with the right policies and programs, station precinct development could be more ambitious. The Committee for Sydney's estimate is that station precincts could deliver up to 45 per cent of the total projected dwellings required in Greater Sydney over the next two decades. The findings of *Rethinking Station Precincts* are:

- There is capacity of up to 327,000 dwellings in highly accessible locations with good amenity.
- This would realise up to $9.3 billion of economic benefits for NSW, by putting housing in locations that enhance productivity and leverage existing infrastructure.
- As well, up to $16.3 billion in financial value could be created through land appreciation and rezoning to support affordable housing and investment in state and local infrastructure.

As the previous discussion on transport oriented development highlights, to be successful these station precincts must be supported by a broad array of social and environmental benefits that help to create a more compact, walkable, sustainable, equitable city and community.

The *Rethinking Station Precincts* report concludes with 10 key recommendations for the NSW Government. These recommendations align with Shelter NSW's own thinking. They also reflect some of the findings of the academic research.

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[3] Sydney Metro is a new type of public transport network for the Greater Sydney Region. This will deliver fast, reliable turn-up-and-go metro services with fully accessible stations. The aim is for a capacity of 40,000 customers an hour per line. This is almost double the capacity of current standard suburban rail lines.

In particular, these recommendations chime with the findings of the University of Queensland study into the three transport oriented development precincts around Australia (Searle, Darchen & Huston 2014). In simple terms, there needs to be a much greater focus on implementation and delivery and not just having the right zoning and planning policies in place.

Committee for Sydney's 10 key recommendations for *Rethinking Station Precincts*	
1. **Integrate station location and land use planning** – make high-level decisions on precinct development in the same process that selects route alignments and station locations. 2. **Establish clear growth targets around stations** – set a goal to accommodate at least 40-45 per cent of Sydney's population growth in walking distance of train and Metro stations. 3. **Adopt state-led rezonings for Major Station Precincts** – these are generally places with material government landholdings and rapid change. 4. **For other locations, support councils to successfully manage station development over time** – here, change is likely to be more gradual. 5. **Establish effective governance for station precincts** – set up a delivery authority for each Major Station Precinct with significant government landholdings and establish collaborative governance structures to work with councils on other locations.	6. **Build capacity of Transport for NSW agencies to oversee a rolling program of discrete station developments** – for stations with less developable land, agencies need to be able to create consistent, repeatable and scalable procurement programs. 7. **Selectively retain strategic sites in public ownership around stations** – where government owns land around strategic station precincts, government should retain a long term leasehold interest (99 years) to enable the land to revert to government for re-leasing, value capture and precinct redevelopment. 8. **Ensure infrastructure contributions are communicated in advance and effectively applied** – to help fund local improvements and transport operations, as well as generalised public services. 9. **Be smart about parking and encourage sustainable transit** – put parking in the right locations so it does not disrupt the walkability and amenity of station precincts. 10. **Require more affordable rental housing in station precincts** – make it a condition of rezoning that a minimum commitment of 5 per cent affordable housing is delivered on private sites, and 10 per cent on government sites.

Source: Committee for Sydney 2022.

Models of precinct development

Rethinking Station Precincts undertook extensive research and analysis on potential models for transport oriented development. The report proposes four models relating to different

scales of transport oriented development precinct. These are:

- **Precinct Model 1: For inner city station precincts.** This CBD centre model concentrates development around the station precinct, featuring high densities around the station and high levels of employment.
- **Precinct Model 2: For major town centres.** These precincts are typically middle ring suburbs, featuring new public spaces and a variety of development types.
- **Precinct Model 3: For existing suburban centres.** These precincts are likely to see more incremental and gradual change, unlike other centres that may have shorter time frames.
- **Precinct Model 4: For new greenfield suburban centres.** New suburban centres draw on the surrounding natural landscape to help define its future character. Current fringe areas are the urban areas of the future and should be designed to be compact and land efficient.

Station development typologies

Rethinking Station Precincts also proposed a series of station development typologies. The report identifies three construction models for building over and around new station precincts. These models depend on the applicable land values and the permitted densities.

Construction Model 1: Integrated station development. This is where a new station development is integrated with over-station development (residential, retail, employment, and/or leisure uses). The key factor is that entire station and the complementary uses are built in a single stage – 'plan once / decide once'. Integrated developments are complex and expensive. They are only likely to be feasible in high land value locations where high density is achievable.

Example: Brisbane Arena – a Brisbane 2032 Olympic venue is being constructed over Roma Street Station through the Cross River Rail Precinct Delivery Strategy.

Example: Euston Station in London – part of the new High Speed 2 rail link to Birmingham. A complex urban regeneration project is being developed on and around the new station.

Example: Bond Street and Tottenham Court Road Stations in London – on the new Elizabeth Line. New commercial and residential development has been constructed over and around station entrances as part of the overall scheme.

Construction Model 2: Over-station development. This is typically where a new station development is specifically designed to accommodate future supporting development. Over-station development can be programmed in locations where initial land values are lower and supporting development becomes viable later in the development cycle. The *Rethinking Station Precinct* report states that this could be a model for the various Sydney Metro stations but would need a repeatable reference design concept. Some schemes may require a development platform to be constructed which can add substantial costs.

Example: Meriton Suites Residential Bondi Junction – developed in the late 1990s directly over the bus-rail interchange with 236 apartments in two towers. This over-station development was constructed some 20 years after the opening of the T4 Eastern Suburbs Line.

Example: Hudson Rail Yards New York – over-station development was funded by a commercial developer; a development platform was constructed over the railway to have limited impact on train operations. A number of commercial and residential towers have been completed.

Construction Model 3: Adjacent site development. This approach is preferred for precincts where land values are relatively low, either in a greenfield location or an urban renewal area of formerly industrial land. There may also be situations where adjacent land is already in government ownership or in a single landholder with a redundant use. These types of development can be complex and would require some form or joint venture/special purpose vehicle or development agency.

Example: Sydney Olympic Park Station – originally constructed for the Sydney 2000 Olympic Games and then the key public transport hub for the further post-Games development of the Homebush Bay site as a mixed use sporting, entertainment, commercial, retail and residential area.

Example: Northern Line Extension to Battersea Power Station – the London Plan 2004 designated the Vauxhall Nine Elms Opportunity Area in South West London to regenerate this area with potential for 18,500 new homes and 18,500 new jobs by 2041. Two new stations and the line extension were funded through infrastructure contributions. Since designation in 2004, over 10,000 homes have been completed, including 20 per cent affordable housing.

Construction Model 4: Infill and small site development. This model is not separately distinguished in the *Rethinking Station Precincts* report. However, the report refers to the potential for infill development around existing stations. The report states: 'Where surface parking lots still exist next to rail stations, consolidate the spaces into structured parking to create room for development' (Committee for Sydney 2022, p.61).

Shelter NSW believes that infill social and affordable housing is a possibility that should be considered on such small sites. As the *Rethinking Station Precincts* report recommends, a balance needs to be struck to provide some commuter carparks at stations. Some carparking can be re- provided in new development schemes at ground level. But commuter parking surveys could be conducted to ascertain the level of provision necessary – particularly as more people now work from home.

Example: The City of Darebin in Melbourne in considering a joint venture with a community housing provider to develop a scheme on a council carpark near Preston Station. This would be a six storey building comprising 39 dwellings and retention of a public carpark at the ground floor level. The project is being delivered by Housing Choices Australia as part of the Victorian Government's Big Housing Build. The council is supporting the project by providing the land on a 50 year lease.

The role of transport agencies

Rethinking Station Precincts advocates for a clear and significant role for transport agencies themselves. Recommendation 6 of *Rethinking Station Precincts* urges capacity building in Transport for NSW agencies to undertake and oversee a rolling program of discrete station developments. Shelter NSW agrees with Committee for Sydney that the state's transport agencies can have a critical role in facilitating, enabling and delivering new housing in the

context of transport oriented development.

But first, let us look to London to see what an ambitious transport agency could achieve.

Transport for London is the public sector agency responsible for the entire transport network across Greater London. It was established under the Greater London Authority Act 1999 and is solely accountable to the Mayor of London.

In September 2023, Transport for London announced that its wholly owned commercial property company was being renamed. TfL Properties became *Places for London*. The name change was not just a cosmetic rebranding. It was intended to better describe the role of the organisation in London – that of delivering new homes and communities across London, with a major objective of delivering affordable housing.

Places for London's remit is to manage Transport for London's property portfolio and development activity without diverting any funding from transport improvements in London. A major focus is the delivery of affordable housing. A snapshot of current activities is shown in the box.

***Places for London* – the development arm of Transport for London**

Homes - sustainable, desirable, beautiful homes, many of them affordable

Places for London plans to start on site for 20,000 new homes by 2031 with a 50 per cent affordable housing target. Developments have already commenced to deliver over 4,000 homes, with over 1,750 being affordable. Partners include house builders and non-profit housing associations, such as Notting Hill and Genesis. Some current examples are:

Connected Living London. Building over 1,500 quality homes across five locations: Arnos Grove, Cockfosters, Montford Place, Nine Elms and Southall Sidings, in partnership with build-to-rent operator, Grainger PLC.

Blackhorse View. Together with Barratt Homes, Places for London has constructed 350 new homes, 50 per cent of which are affordable. These are in the creative and cultural hub of Walthamstow. All are now occupied.

The Earls Court Development Company. This is a joint venture between Places for London and real estate company Delancey. They have set up The Earls Court Development Company and are now working to regenerate this significant part of West London. This is a designated Opportunity Area in the London Plan 2021 and, as such, a transport oriented development precinct. It will eventually deliver 6,500 new and affordable homes, together with long-term employment opportunities and low-cost workspace.

Skills and training

Build East. Together with The Skills Centre, Places for London is upskilling people to enter the construction industry. Places for London has trained nearly 5,000 people so far and assisted 1,500 people into paid work, including on its own projects.

Transport for NSW was established in November 2011 as a new integrated transport authority with the mission of putting the customer at the centre of planning and decision-making. Transport for NSW went on to manage the largest new transport infrastructure program in the state's history.

Alongside Transport for NSW, there is a dedicated agency for holding the state's transport assets. This is the Transport Asset Holding Entity or TAHE. TAHE is the owner of an extensive portfolio of railway assets across NSW, including tracks, trains, stations, significant land holdings around stations including retail spaces. It has a broad remit which includes a social responsibility objective: to build 'stronger communities by creating vibrant and successful places and returning value' (TAHE 2024).

In September 2023, the NSW Government announced a significant change in the structure and purpose of the Transport Asset Holding Entity:

- TAHE will no longer be a state-owned corporation and so it will not have to make a profit from holding the assets of the public rail system.
- TAHE will become a non-commercial public non-financial corporation similar to Sydney Trains, NSW Trains and Venues NSW.
- By June 2024, the NSW Government will introduce legislative changes to TAHE's status, and the organisation will be renamed.

The media release was explicit in stating that 'the new structure will see TAHE increase its focus on maximising the value of its transport assets, especially surplus land near railway stations that could be repurposed to help solve the state's housing shortage' (NSW Treasurer 2023).

This presents a significant opportunity to maximise the delivery of housing across NSW – especially social and affordable housing.

5   What has the NSW Government announced?

NSW Government announcements on transport oriented development

On 7 December 2023, the NSW Premier Chris Minns and the Minister for Planning and Public Spaces Paul Scully made a joint announcement on the government's commitment to address the housing crisis by rebalancing housing growth across the state with a focus on well-located homes close to transport, jobs and existing infrastructure (NSW Premier and the NSW Minister for Planning and Public Spaces 2023). In December 2023, the NSW Government published a short explanatory document called *Transport Oriented Development Program* (NSW Government 2023).

The NSW Government calls its approach a *Shared Responsibility*. The proposed plan identifies two clusters of stations that could support new housing on both the Sydney Trains and NSW Trains networks. These are called *Tier One Accelerated Precincts and Tier Two Rezonings*. Put simply, Tier One Precincts have a greater housing capacity than the Tier Two Rezoning Precincts. However, together these two sets of initiatives are set to deliver 185,000 new homes over 15 years. Clear commencement requirements will be required to ensure that delivery of housing proceeds in a timely manner.

Tier One Accelerated Precincts

A summary of the Tier One Accelerated Precincts is provided in the box. One immediate observation is that six out of the eight precincts are on Sydney Metro lines. Half of the Tier One Precincts are located on the Metro North West Line. The NSW Department of Planning and Environment reviewed a long list of more than 305 Sydney Trains, Sydney Metro, and Intercity stations prior to the formal announcement. These included key transport hubs on the main heavy rail lines (McGowan, Smith and Maddison 2023).

Tier One – Accelerated Precincts

Eight nominated stations across Sydney:
- **Metro North West Line:**
  - Kellyville Station
  - Bella Vista Station
  - Macquarie Park Station
  - Crows Nest Station.
- **Metro West Line:**
  - The Bays Station.
- **Metro South West Line:**
  - Bankstown Station.
- **T1 North Shore Line / T9 Northern Line:**
  - Hornsby Station.
  - **T2 Inner West Line:**
  - Homebush Station.

Some key issues and points of discussion arise from the NSW Government's announcement of Tier One Precincts. These are shown in the following box.

Key issues and points for discussion – Tier One Precincts

1. Could other stations on the Sydney rail network be added to the accelerated precincts list?

2. Could the NSW Government adopt a cascading approach to accelerated precinct nomination – such that clusters of additional stations are added each year building up the potential development capacity over time?

3. What is the approach of the NSW Government to the delivery and management of the affordable housing component of the Tier One Precincts?

4. How will the NSW Government ensure that identified supporting community infrastructure projects are funded and delivered in a timely manner to ensure maximum housing capacity?

5. Will the precinct planning approach being undertaken by the NSW Government identify barriers to delivery in the nominated precincts?

6. Will the NSW Government put in place a fully transparent 'targets and timetables' monitoring system to ensure housing delivery occurs in a timely manner and any barriers to delivery can be rectified?

Tier Two Rezonings

A summary of the Tier Two Rezoning Precincts is shown in the following box. Out of the 31 Tier Two station locations, 18 are on the Sydney Trains network and 13 are on the NSW Trains network, mostly on the Central Coast and Newcastle Line. As with the Tier One locations, there is a focus on Metro stations as well as major centres on the Illawarra Line.

One observation is that there are only two nominated Tier Two Precincts on the entire T1 Western Line / T2 Inner West Line. There is only one nominated precinct on the T8 South Line. It would seem likely that there would be more opportunities for rezonings across the Sydney Trains network that this suggests.

Tier Two – Rezoning Precincts

Thirty one nominated stations across NSW:

- **Metro South West Line:**
  - Wiley Park Metro
  - Canterbury Metro
  - Dulwich Hill Station
  - Marrickville Station.

- **Metro West Line:**
  - North Strathfield Metro.

- **Metro Western Sydney Airport Line:**
  - St Marys Metro.

- **T1 North Shore Line / T9 Northern Line:**
  - Gordon Station
  - Killara Station
  - Lindfield Station
  - Roseville Station.

- **T2 Inner West Line:**
  - Lidcombe Station
  - Croydon Station
  - Ashfield Station.

- **T3 Bankstown Line:**
  - Berala Station.

- **T4 Illawarra Line:**
  - Kogarah
  - Rockdale
  - Banksia.

- **T8 South Line:**
  - Turrella Station.

- **Central Coast & Newcastle Line:**
  - Gosford Station
  - Tuggerah Station
  - Wyong Station
  - Morisset Station
  - Booragul Station
  - Teralba Station
  - Kotara Station
  - Adamstown Station
  - Hamilton Station
  - Newcastle Interchange.

- **South Coast Line:**
  - Dapto Station
  - North Wollongong Station
  - Corrimal Station.

Development capacity:
- Delivery of up to **138,000** new, well located, high and mid-rise homes over the next 15 years.
- The rezoning will apply an inclusionary zoning requirement for a **2 per cent affordable housing contribution** for all new development. The existing infill affordable housing provisions set out in the Housing SEPP 2021 will continue to apply.

Implementation:
- From April 2024, new planning controls will apply to within a **400 metre radius of**

the nominated stations.

- The new controls will permit residential apartment buildings in all residential zones (R1, R2, R2 and R4) in the 400 metre zone around the station. Also, residential flat buildings and shop top housing will be permitted in any zoned local or commercial centres (E1 and E2) in the designated locations.
- A height limit of **21 metres** will apply (around six storeys) and a floor space ratio of **3:1**. Other detailed planning controls will be included in the new SEPP.

- When the new SEPP comes into effect, **development applications** can be lodged with the relevant council who will determine the applications. Local infrastructure will continue to be funded through section 7.11 or section 7.12 contributions paid by developers. An interim section 7.12 contribution may be set by the NSW Government.
- The relevant councils will be encouraged to prepare **strategic plans** to manage development in these transport oriented development precincts. The SEPP provisions will continue to apply to these precincts until such time as these local strategic plans are in place. The strategic plans will need to reflect or exceed the uplift in the SEPP and any amended controls will need to reflect the medium density potential of the areas. Provision should be made for long term affordable housing provisions in perpetuity.

Some key issues and points of discussion arise from the NSW Government's announcement of Tier Two Rezoning Precincts. These are shown in the following box.

Key issues and points for discussion – Tier Two Precincts

1. Could other stations on the Sydney Trains and NSW Trains network stations be added to the Tier Two Precincts list?

2. Could the NSW Government adopt a cascading approach to accelerated Tier Two Precinct designation – such that clusters of additional stations are added each year building up the potential development capacity over time?

3. What is the approach of the NSW Government to the delivery and management of the affordable housing component of the Tier Two Precincts? Should the 2 per cent inclusionary zoning requirement be increased over time?

4. How will the NSW Government ensure that identified supporting community infrastructure projects are funded and delivered in a timely manner to ensure maximum housing capacity?

5 Will additional funding be available from the NSW Government to support councils in the timely preparation of local strategic plans?

6. What form of monitoring system should be put in place by the NSW Government to ensure housing delivery occurs in a timely manner and any barriers to delivery, including local and community infrastructure requirements, can be rectified?

Design issues

Improving design outcomes is essential in any new program to increase housing supply. Good design is generally supported by everyone involved in the planning and construction of housing. Unfortunately, most communities can point to examples of bad design, poorly sited buildings, or poorly resolved concerns around privacy and overshadowing. Good design has obvious benefits for the building's occupants, place-making, and the wider community.

The NSW Government's policy document on the Transport Oriented Development Program clearly states that good design and well-constructed homes will be a critical focus (NSW Government 2023). The principles of the NSW Apartment Design Guide will apply to both new apartments and shop top housing. This design guide is the main guidance for high density development in NSW and covers issues such as siting, amenity, landscaping, environmental performance as well as the function of design review panels (NSW Department of Planning and Environment 2015).

In addition to the Apartment Design Guide, the NSW Government is developing a 'pattern book' of endorsed housing designs for low-rise and mid-rise housing developments. This is intended to provide a suite of model schemes for housing projects of up to six storeys. This will permit developers who choose an endorsed pattern book design to have an accelerated approval pathway. It is not clear at this stage whether the pattern book will be limited in scope to external design or whether it will include internal layout and other internal design issues.

Specifically for the Tier One Precincts, the NSW Government is proposing that developers can select architects from a pre-approved list set up by the NSW Government Architect. This will mean that the requirement to run a design competition can be by-passed, thus speeding up delivery.

One theme of this discussion paper is the need for new housing to be suitable for a diverse range of individuals and households. This is an issue that has received insufficient attention in the series of NSW Government announcements over the past year. These concerns should be built into the policy and programs relating to transport oriented development.

There are a number of key issues and points for discussion on the issue of good design. These are shown in the following box.

Key issues and points for discussion – good design

1. Would the pattern book approach to improving design be welcomed by both communities and housing developers?

2. Should the pattern book include internal amenity issues (such as ceiling heights, solar access, internal layout, natural ventilation, storage, and noise)?

3. How can a pattern book approach capture a full range of housing types – semi-detached, dual occupancies, terrace or row houses, manor houses, and apartment buildings of various heights?

4. Can we ensure that future housing designs benefit the future occupants and gain acceptance from the local community?

5. Can we ensure that the unique character of local communities is respected, and conservation issues are considered without preventing new homes being built?

6. How can universal design principles be integrated into future residential developments in transport oriented development precincts? And should they become the norm for new medium and high density housing developments?

6 Shelter NSW's stations opportunities analysis

The Shelter NSW desktop research method

In this discussion paper, we wanted to test the key proposition that there are more opportunities for transport oriented development across Greater Sydney than just those presented in the recent NSW Government announcements (NSW Government 2023; NSW Premier and the NSW Minister for Planning and Public Spaces 2023). As previously outlined in this discussion paper, our research has been informed both by the KPMG Report *Station Nation* (2023) and the Committee for Sydney Report *Rethinking Station Precincts* (2022).

Shelter NSW has conducted a desktop review using the NSW Government's Planning Portal Spatial Viewer and Apple Maps. We have prepared slide decks of spatial information (satellite view and land use zones) for every station in the Sydney rail network. This is a total of 170 stations. We also undertook the same exercise for the existing Sydney Metro North West, the new Metro stations currently under construction on Metro North West, the stations on the Metro South West, Metro West, and Metro Western Sydney Airport.

The analysis excluded the Sydney CBD stations: Central, Town Hall, Wynyard. Museum, St James, Circular Quay, and Martin Place, together with the CBD Metro stations currently under construction. The Domestic Airport and International Airport stations have also been excluded.

Sydney Network Stations Opportunities Analysis – train and Metro lines reviewed	
T1 North Shore & Western Line	Metro North West Line
T2 Inner West & Leppington Line	Metro South West Line
T3 Bankstown Line	Metro West Line
T4 Eastern Suburbs & Illawarra Line	Metro Western Sydney Airport
Line T5 Cumberland Line	
T7 Olympic Park	
Line T8 Airport &	
South Line	
T9 Northern Line	

Note: The Metro South West Line involves upgrading the T3 Bankstown Line between Sydenham and Bankstown to metro standards.

The limitations of any desktop study are obvious. Detailed technical studies, legal land referencing investigations, local infrastructure assessments, and site suitability analyses are all necessary to ascertain whether a proposed station precinct could be suitable for transport oriented development uplifts or whether infill or adjacent sites could deliver new housing. Shelter NSW recognise that our research is indicative only. But we consider that such an

indicative study may trigger a wider discussion about the future housing potential of the Greater Sydney Region – with a particular focus on social and affordable housing.

Rethinking Station Precincts observed that for the vast majority of new and existing stations, the amount of land in state government ownership will be limited to about one hectare or less. But the report considered that there will be viable development opportunities around dozens of stations. However, these opportunities usually go missing as the transport agencies are not 'deeply focussed' on enabling development around their stations (Committee for Sydney 2022, p.59). Our report wants to pick up on some of these potential opportunities for future development.

In analysing the desktop station spatial data, we developed a four category model based on the NSW Government's Tier One and Tier Two Precincts. But we took the scope of our desktop review a step further to capture some of the important insights from *Rethinking Station Precincts*. These analytical categories are show in the following box.

Shelter NSW Station Opportunities Analysis – the four categories	
Category 1	**Category 2**
Designated Tier One Precincts under current current NSW Government proposals.	Designated Tier Two Precincts under NSW Government proposals.
Potential Tier One Precincts for future rounds rounds of the Transport Oriented Development Development Program.	Potential Tier Two Precincts for future of the Transport Oriented Program.
Overall, locations that could accommodated accommodated significant urban renewal. appropriate	Overall, locations that could increased housing densities with rezoning.
Locations recommended as masterplanned precincts in partnership with local government land in with supporting community infrastructure.	Potential infill sites around stations on public ownership.
Analysis will indicate existing/current zoning.	Analysis will indicate existing/current zoning.
Category 3	**Category 4**
Potential investigation opportunities for large projects. sites or joint ventures.	Current over-station development
This follows the adjacent sites category in	Potential opportunities over-station development involving detailed site investigation and feasibility analysis.
Rethinking Station Precincts.	
Locations may require a masterplanned categories approach as well as joint venture or station government agency led delivery. *Precincts*.	This follows the station development (integrated station development; over-development) in *Rethinking Station Precincts*.
Analysis will indicate existing/current zoning.	Analysis will indicate existing/current zoning.

Findings from the Shelter NSW station opportunities analysis

The following five tables summarise the potential opportunities revealed from the desktop research analysis. A much fuller description of the opportunities on each Sydney rail network train line and Metro line are presented in Appendix B. Also, for the non-technical specialist, a high level table of the main zones used in this analysis is presented in Appendix A. This gives the main residential types permitted under the main zones identified in the analysis. In addition, a very brief description of each zone is provided in the list of abbreviations at the start of the report.

Shelter NSW has developed slides decks for each train and Metro line. These include the zoning plan and the satellite spatial information for each station. The full package of spatial data analysis can be viewed on request.

The findings of the station opportunities analysis are summarised in the next five tables relating to the four categories described above, with Category 2 being summarised in two tables.

Category 1 Findings. The analysis has identified **17 potential additional Tier One Precincts**. These are shown in the following box.

Sydney Rail Network	Category 1 – Potential Tier One Precincts
Metro North	Tallawong, Rouse Hill, Norwest, Epping
West Metro West	Westmead, Rosehill[4]
Metro Western Sydney	Orchard Hills, Luddenham
Airport T1 North Shore /	St Leonards / Rooty Hill, Blacktown,
Western Line T2 Inner West	Westmead Strathfield, Burwood
Line	Sutherland, Hurstville, Kogarah, Miranda
T4 Eastern Suburbs / Illawarra Line	Epping, West Ryde
T9 Northern Line	

Category 2A Findings. The analysis has identified **22 potential additional Tier Two Precincts** surrounding the stations in the following box. The desktop research highlighted that many station precincts already have substantial R4 (High Density Residential) zoned land. These stations have generally been excluded from the potential additional Tier Two list. The list of station identified in Category 2A are those locations that currently do not support much high density residential development.

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[4] The NSW Government is currently exploring the feasibility of a new Metro West station at Rosehill in conjunction with a proposal to relocate Rosehill Race Course with the site having a potential for 25,000 homes

The zoning analysis conducted for the station opportunities analysis has also revealed that out of the 18 designated Tier Two Precincts on the Sydney rail network, only four stations have no R4 zoned land in the vicinity. These stations are: North Strathfield Metro, Dulwich Hill, Croydon, and Ashfield. This would indicate that delivery of higher density development in the Tier Two Precincts needs to be closely monitored. Rezoning alone is unlikely to be a sufficient mechanism on its own to unlock high density residential sites in these locations. Current and future obstacles to delivering new housing in these areas should be carefully considered.

Sydney Rail Network	Category 2A– Potential Tier Two Precincts
Metro West	Burwood North, Five Dock
T1 North Shore / Western Line	Wahroonga, Turramurra, Pymble / Kingswood, Werrington
T3 Bankstown Line Remainder	Regents Park, Birrong, Yagoona, Warwick Farm, Carramar
T4 Eastern Suburbs / Illawarra Line	Jannali, Mortdale, Rockdale, Kirrawee
T5 Cumberland Line	Casula
T7 Olympic Park Line	Sydney Olympic Park
T8 Airport & South Line	Revesby
T9 Northern Line	Eastwood, West Ryde, Concord West

Category 2B Findings. The analysis has identified **61 stations,** shown in the following box, where there may be opportunities for using rail lands (usually of less than 1 hectare) for discreet **infill housing developments**. These sites are mainly carparks and would require parking surveys to understand how they are currently being used. It is possible to design medium rise housing developments that accommodate parking on the ground level. Such sites would require further land investigations and in planning terms would necessitate spot rezonings to obtain development approval. In addition, the requirements of *State Environmental Planning Policy (Transport and Infrastructure) 2021 Division 15 Railways* would need to be complied with. Shelter NSW believes that small infill sites such as these could easily be developed by community housing providers as 100 per cent social and affordable housing.

Sydney Rail Network	Category 2B – Rail Infill Opportunities (RIO)
Metro South West	Punchbowl, Lakemba, Belmore, Dulwich Hill, Marrickville
Metro West	North Strathfield Metro
Metro Western Sydney Airport	St Marys Metro
T1 North Shore / Western Line	Berowra, Asquith, Wahroonga, Gordon, Killara, Lindfield, Roseville, Artarmon / Emu Plains, Penrith, Kingswood, Werrington, Wentworthville
	Lidcombe, Ashfield
T2 Inner West Line	Berala, Regents Park, Birrong, Yagoona, Carramar, St Peters
T3 Bankstown Line Remainder T4 Eastern Suburbs / Illawarra Line	Waterfall, Heathcote, Loftus, Como, Oatley, Mortdale, Rockdale, Tempe, Gymea, Kirrawee
T5 Cumberland Line	Edmondson Park, Casula, Liverpool, Warwick Farm, Fairfield, Richmond, East Richmond, Windsor
T8 Airport & South	Campbelltown, Leumeah, Ingleburn, Macquarie Fields, East Hills, Revesby, Padstow, Riverwood, Narwee, Bardwell Park
T9 Northern Line	Thornleigh, Beecroft, Denistone, West Ryde, Concord West

Category 3 Findings. The analysis has identified **27 station precincts** where substantial **adjacent land holdings** suggest the potential for housing or mixed use developments. These are shown in the following box. These all warrant further investigation to include land capability as well as joint venture/partnering opportunities to facilitate delivery. It should be noted that all lines relating to Sydney Trains and Sydney Metro have some opportunity for infill development on government owned land.

Sydney Rail Network	Category 3 – Adjacent Site Development (ASD)
Metro North West	Hills Showground, Cherrybrook, Macquarie Park
Metro South West	Canterbury, Sydenham
Metro West	Rosehill, Sydney Olympic Park Metro
Metro Western Sydney Airport	St Marys Metro
T1 North Shore / Western Line	Kingswood, Werrington, St Marys, Seven Hills, Granville & Granville Junction, Clyde
T2 Inner West Line	Lewisham, Petersham, Macdonaldtown
T3 Bankstown Line Remainder	Villawood, Leightonfield
T4 Eastern Suburbs / Illawarra Line	Caringbah

T5 Cumberland Line	Merrylands, Mulgrave, Riverstone, Schofields
T7 Olympic Park Line	Sydney Olympic Park
T8 Airport & South Line	Macarthur, Panania, Bexley North
T9 Northern Line	Pennant Hills

Category 4 Findings. The analysis has identified potentially **eight station** locations where some form of **over-station development** could be investigated. These locations are shown in the following box. It is recognised that these developments may need to be high density mixed used developments to achieve viability. Crows Nest, Victoria Cross, and Waterloo are all under construction. They present good exemplars of integrated station development. The Environmental Impact Statement for the Sydney Olympic Park Metro Station, which includes over-station and adjacent development, was on public exhibition in November and December 2022 and is currently under assessment.

Sydney Rail Network	Category 4 – Over Station Development / Integrated Station Development (OSD/ISD)
Metro North West	Norwest, Hills Showground, Castle Hill (all are between 20 to 25 metres below street level); Crows Nest and Victoria Cross (under construction)
Metro South West	Waterloo (under construction)
Metro West	Sydney Olympic Park Metro
T1 North Shore / Western Line	Hornsby, Chatswood (south of station box)
T2 Inner West Line	Newtown (over-station to the east of King Street)
T4 Eastern Suburbs / Illawarra Line	Woollahra (abandoned station reservation north of Wallaroy Road)
T9 Northern Line	Epping

Conclusions of the Shelter NSW station opportunities analysis

The Shelter NSW station opportunities analysis for the entire Sydney rail network has demonstrated a number of simple propositions.

1. On the basis of this preliminary and indicative research, Shelter NSW has identified 135 potential transport oriented development opportunities in the Greater Sydney Region. These are in addition to the NSW Government's recently designated Tier One and Tier Two Precincts.

2. There are many more opportunities for transport oriented development in the Greater Sydney Region than the eight Tier One Precincts and the 18 Tier Two Precincts designated by the NSW Government. We expect that this finding can be extended to

the NSW Trains network as well, particularly the NSW TrainLink network (Hunter, Central Coast, Blue Mountains, South Coast).

3.   There are 17 potential additional Tier One Precincts and 22 potential additional Tier Two Precincts. We have identified 61 stations where infill development might be possible on government owned rail land near stations. There are potentially a further 27 larger adjacent site development opportunities. Finally, there are eight locations where over-station development may be feasible.

4.   Our research has also revealed that out of the 18 designated Tier Two Precincts on the Sydney rail network, only four stations have no R4 zoned land in the vicinity. This would suggest that rezoning alone is unlikely to be sufficient to unlock high density residential sites in these locations.

5.   The broad conclusion of Shelter NSW's Station Opportunity Analysis is a very straightforward one. There is scope in the depth of opportunities for transport oriented development in the Greater Sydney Region for the NSW Government to adopt a rolling program of designations of transport oriented development precincts.

6.   The implications of the core research findings will be discussed further in the final part of the discussion paper which will present Shelter NSW's recommendations to the NSW Government.

7   Our recommendations to the NSW Government

This section of the discussion paper reflects on the NSW Government's current transport oriented development program and Shelter NSW's own station opportunities research. We conclude this discussion paper by proposing a series of recommendations for the NSW Government.

Our 17 recommendations

The challenge of delivering more housing in well-located precincts in the Greater Sydney Region and across NSW is a big one. Ensuring that the transport oriented development precincts deliver social affordable housing as well is an even greater challenge – but a necessary and important goal.

Development around rail and Metro station precincts is complex and difficult. To achieve the ambitions of the NSW Government's Transport Oriented Development Program a concerted focus on implementation involving program management, monitoring and funding will be necessary. The public sector will need to lead this drive to ensure that housing targets are met, and delivery obstacles are removed. This will require the NSW Government to designate a lead delivery body – we think this should be a NSW transport agency.

Shelter NSW is concerned that the focus on housing numbers could too easily mask the debate on what kind of housing should be provided. Social and affordable housing should be delivered and managed by not-for-profit community housing providers and held in perpetuity. This must be central to the NSW Government's program ambitions.

Taken at face value, our research indicates that there is scope and opportunity for the NSW Government to transform the current Transport Oriented Development Program into a rolling program of station precincts. Ambition is essential. The challenge of housing supply is not likely to diminish any time soon.

The research in this discussion paper has highlighted **135 locations** on the Sydney rail network where different opportunities for increased transport oriented development may be possible. We have conducted a straightforward desk-based review. So, we are passing the baton to the relevant NSW Government agencies to investigate these locations further.

One finding seems a modest one. There are **61 rail or Metro stations** on the Sydney rail network where there may be potential for small scale easy to deliver **infill schemes**. Shelter NSW believes that these present the perfect opportunity to partner with community housing providers to deliver and manage 100 per cent social and affordable housing schemes. With their location adjacent to stations, we think that some of this housing should be reserved for essential workers to access their places of work quickly on public transport and to benefit the community more broadly.

In preparing this report, Shelter NSW has built on the ground-breaking publication from Committee for Sydney: *Rethinking Station Precincts* (2022). Shelter NSW is on the same page with the Committee for Sydney. Many of the recommendations in *Rethinking Station Precincts* have been replicated in our recommendations. For some, such as with affordable rental housing, we think the NSW Government can and should go further. Shelter NSW's recommendations are shown in the following box.

This is a discussion paper. It means we don't have all the answers, but we understand where the direction of travel should be. Shelter NSW believes that providing increased social and affordable housing for people in NSW should be a core value of all we undertake in planning and development.

We welcome constructive debate on all the issues raised in this discussion paper.

Shelter NSW's recommendations to the NSW Government

Program management, monitoring and funding

Rationale. The NSW Government's Transport Oriented Development Program will only fulfil its ambitions if there is a strong 'plan-monitor-manage' approach. This must include a trouble- shooting component to address any obstacles to effective delivery of new homes in the designated precincts.

R1. Establish clear growth targets around stations and set a goal to accommodate at least 40-50 per cent of Sydney's population growth to be in walking distance of a train or Metro station.

R2. Investigate the 135 transport oriented development opportunities on the Sydney rail network identified in this report.

R3. Establish a rolling program of transport oriented development precincts with a formal review and update to occur every two years.

R4. Establish an active monitoring and management system for the current Tier One and Tier Two Precincts to ensure housing completion targets are achieved and barriers to development identified.

R5. Commit to the continuation of the $520 million community infrastructure fund in order to ensure required local and community infrastructure is in place to support both Tier One and Tier Two Precincts.

Social and affordable housing

Rationale. Shelter NSW believes that the ambitions to deliver social and affordable housing will be key to ensuring widespread community acceptance of the Transport Oriented Development Program. Targets around inclusionary zoning need to be ambitious, and they should increase over time. This 'accelerator approach' will have the added bonus of incentivising early delivery under less stringent requirements. Increasing the provision of social and affordable housing as a major part of future housing supply around rail stations will also promote social sustainability and long term local economic development.

Shelter NSW believes that the rail lands infill sites are a prime opportunity to delivery discrete well- designed 100 per cent social and affordable housing schemes, possibly based on a pattern book approach. All social and affordable housing delivered through transport oriented development should be held in perpetuity and be managed by community housing providers.

R6. Adopt an accelerator approach to inclusionary zoning in Tier One Precincts with the current 15 per cent applying in the first two year period (April 2024 to March 2026) and thereafter increase by 2 per cent for every future two year planning period.

R7. Adopt a standard 10 per cent inclusionary zoning requirement in perpetuity for Tier Two Precincts with due consideration given to an accelerator approach as recommended for Tier One Precincts.

R8. Develop small infill sites near train or Metro stations as 100 per cent social and affordable housing developments partnering with pre-qualified not-for-profit community housing providers and a proportion of the housing reserved for essential workers.

R9. Adopt a 30 per cent inclusionary zoning requirement on all developments on adjacent publicly owned sites prior to rezoning with an additional requirement that affordable housing be held in perpetuity.

R10. Mandate that all social and affordable housing delivered under the Transport Oriented Development Program be managed by registered not-for-profit community housing providers.

Partnering

Rationale. Experience in urban renewal – whether large or small projects – attests to the value of establishing effective partnerships. Such partnership should always involve local councils and relevant community housing providers.

R11. Establish effective governance or partnership structures for each transport oriented development precinct with special consideration to the role of local councils.

Delivery body

Rationale. Shelter NSW believes that having the right planning policies and regulations in place is a necessary but not sufficient element to increasing housing supply. The market alone will not deliver the ambition of increased housing supply needed to address the problem in NSW. There will need to be a hands-on approach to implementation by the NSW Government. Hence, like the Committee for Sydney, we are recommending that a government transport agency, or a unit or directorate within it, be charged with overseeing a rolling program of transport oriented developments in NSW.

R12. Designate a government transport agency as the overall responsible delivery body for the Transport Oriented Development Program with a clear mandate and ambitious aims.

R13. Build capacity in the responsible delivery body to monitor and manage the program with a particular remit to address obstacles or barriers to housing development in the Tier One and Tier Two Precincts.

R14. Develop scalable and repeatable models of infill social and affordable housing projects, including appropriate design guides and pattern books.

R15. Build increased capacity for developing larger adjacent sites for housing or mixed use developments using a range of delivery models / joint venture partnerships.

R16. Retain strategic and adjacent sites around stations in public ownership with the NSW Government retaining the long term leasehold interest enabling the land to revert to government control in the future.

Transparency

Rationale. The advent calendar of government media releases and reports in the press over 2023 has highlighted the need for the process of selection of locations for transport oriented development to be much more transparent. If, as Shelter NSW and the Committee for Sydney both think, transport oriented development has the potential to accommodate nearly half the future population growth in the Greater Sydney Region, a much more open and transparent approach should be adopted to ensure that the communities affected can be fully informed and engaged.

R17. Require much more transparency in the process of the selection of station locations for the Transport Oriented Development Program, including the availability of technical studies, proposed boundaries and infrastructure requirements.

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Appendix A – Simplified Zoning Table

Simplified Zoning Tables Diagram

Showing housing types permitted with consent

Zone	Housing types permitted with consent
Zone R1 General Residential	Attached dwellings; Boarding houses; Dwelling houses; Group homes; Hostels; Multi dwelling housing; Residential flat buildings; Semi-detached dwellings; Seniors' housing; Shop top housing.
Zone R2 Low Density Residential	Dwelling houses; Group homes.
Zone R3 Medium Density Residential	Attached dwellings; Boarding houses; Group homes; Multi dwelling housing; Seniors' housing.
Zone R4 High Density Residential	Boarding houses; Residential flat buildings; Shop top housing.
Zone E1 Local Centre	Boarding houses; Shop top housing. Not permitted with consent.
Zone E2 Commercial	
Centre Zone MU1 Mixed Use	Boarding houses; Shop top housing.
Zone SP4 Enterprise	Not permitted with consent.

Source: Standard Instrument—Principal Local Environmental Plan 2006.

Appendix B - Sydney Rail Network Station Opportunities Analysis

Shelter NSW - Sydney Rail Network Station Opportunities Analysis

Note Sydney CBD stations have been excluded. The stations in italics in the table are the current NSW Government designated Tier 1 and Tier 2 Precincts.

Sydney Rail Network Metro or Train Line	Category 1 Designated and potential Tier 1 Precincts Urban renewal and master planned precincts	Category 2 Designated and potential Tier 2 Precincts Locations for rezoning Potential infill sites in public ownership	Category 3 Potential investigation opportunities for large sites or joint ventures	Category 4 Current over-station development projects Potential investigation opportunities over-station development

Metro North West	Tallawong (existing B4, B6, IN1, R2, R3 and RE1) – investigate housing capacity; potential Tier 1 precinct. **Rouse Hill** (existing MU1, R1, R3 and SP1) – investigate housing capacity; potential Tier 1 precinct. *Kellyville (existing E1, R1, R2, R4 and SP2) – designated Tier 1.* *Bella Vista (existing E1, R1, R2, SP2 and SP4) – designated Tier 1.* **Norwest** (existing E1, R3, R4 and SP4) – investigate housing capacity; potential Tier 1. precinct. **Epping** (existing E1, R4 and RE1) – investigate housing capacity; potential Tier 1. *Macquarie Park (existing E2, E3, R2 and R3) – designated Tier 1.* *Crows Nest (existing E2, MU1, R3 and R4) – designated Tier 1.*		**Hills Showground** (existing E1, R1, R4 and RE1) – investigate adjacent site status and development opportunities in E1 zone. **Cherrybrook** (existing C4, MU1, R2, R4 and RE1) - investigate adjacent site status and development opportunities in R4 zone. *Macquarie Park – (existing E2, E3, R2, R3 and R4) – investigate site status and development opportunities in perimeter R2, R3 and R4 zones.*	*Crows Nest (existing E2, MU1, R3 and R4) – construction in progress; designated Tier 1.* **Victoria Cross** (existing E2, MU1, R3 and R4) – construction in progress. **Norwest**, **Hills Showground, Castle Hill:** These Metro stations are between 20 to 25 metres below street level. They may be able to accommodate over-station development.

Metro South West	Bankstown (existing B4, R2 and R4) – designated Tier 1	Punchbowl (existing R2, R3 and R4) – review adjacent carpark sites. Wiley Park (existing R3, R4 and B2) – no adjacent infill opportunities – designated Tier 2. Lakemba (existing R3, R4 and B2) –review carpark sites adjacent on the northern and southern sides. Belmore (existing R3, R4 and B2) – review adjacent carpark site on the northern and southern sides. Dulwich Hill (existing R1, R2 and E1) – review adjacent carpark sites – designated Tier 2. Marrickville (existing R1, R2, R4 and E1) – review adjacent rail sites to the east of the station – designated Tier 2.	Canterbury (existing R3, R4 and B2) – review adjacent non-residential sites – designated Tier 2. Sydenham (existing R2 and E4; extensive rail lands) – investigate adjacent development opportunities.	Waterloo (existing E1, MU1, R1 and RE1) – construction in progress.

Metro West	Westmead Metro (existing R2 and R4) – essential worker hub; potential Tier 1. **Rosehill** (existing R3, R4, E3, MU1 and RE2) – potential Tier 1. *The Bays / Bays West* – *designated Tier 1 (major urban renewal area).*	*North Strathfield Metro (existing R2 and R3) – possible infill rail site opportunity) – designated Tier 2.* **Burwood North** (existing R2, R3, E3, and MU1) – rezoning opportunity; potential Tier 2. **Five Dock** (existing R2, R3 and MU1) – rezoning opportunities; potential Tier 2.	**Rosehill** (existing R3, R4, E3, MU1 and RE2) – investigate adjacent non-residential sites). **Sydney Olympic Park Metro** (existing B4) – review opportunities for residential R4 development.	**Sydney Olympic Park Metro** (existing B4) – review opportunities for residential R4 development.
Metro Western Sydney Airport	**Orchard Hills** (existing RU4) – opportunities for medium density residential. **Luddenham** (existing MU and ENZ) – opportunities for medium density residential.	*St Marys Metro (existing R2, R3, R4, E4, and MU1) – adjacent carpark opportunities; designated Tier 2.*	*St Marys (existing R2, R3, R4, E4, and MU1) – review substantial surface carparks in a wide vicinity and land ownership.*	

| T1 North Shore Line | **St Leonards** – review permitted uses in E2 and E4 zones. | **Berowra** (existing R2, R3 and E1) – review car parking sites.
Asquith (existing R2, R3, R4 and E1) – review car parking sites.
Wahroonga (existing R2, R4 and E1) – review car parking sites; potential Tier 2.
Turramurra (existing R4 and E1) – review development obstacles / land ownership; potential Tier 2.
Pymble (existing R4 and E1) – review development obstacles and E1 zone; potential Tier 2.
***Gordon** (existing R2, R4 and E1) – review car parking and rail land sites – designated Tier 2.*
***Killara** (existing R2, R4 and E1) – review adjacent car parking and land ownership – designated Tier 2.*
***Lindfield** (existing R2, R3, R4 and E1) – review adjacent* | | ***Hornsby** (existing E2, E3, MU1, R2, R3, R4) – investigate technical feasibility – designated Tier 1*
Chatswood (E2, MU1, R2, R4 and RE1) – location south of station box to investigate technical feasibility. |

		car parking and land ownership – designated Tier 2. ***Roseville** (existing R2, R4 and E1) – review adjacent car parking – designated Tier 2.* **Artarmon** (existing R3, R4 and E1) – review rail land on north side of station.		

| T1 Western Line | Rooty Hill (existing R2, R4, and MU1) – review current use of rail lands; potential Tier 1.
Blacktown (existing R2, R4, E2 and MU1) – R2 zones are within 1200 metres of the station; potential Tier 1.
Westmead (existing R2 and R4) – essential worker hub; potential Tier 1. | Emu Plains (existing R2, E1 and E4; extensive surface parking) – review adjacent car parking.
Penrith (existing E1, E2 and E4; extensive surface parking) – review adjacent carpark sites.
Kingswood (existing R3, R4, E4 and MU1; extensive surface parking) – review adjacent carpark sites and land ownership; potential Tier 2.
Werrington (existing R3 and R4; extensive surface parking) – review adjacent carpark sites and land ownership; potential Tier 2. | Kingswood (existing R3, R4, E4 and MU1; extensive surface parking) – review adjacent car parking and land ownership.
Werrington (existing R3 and R4; extensive surface parking) – review adjacent car parking and land ownership.
St Marys (existing R2, R3, R4, E4, and MU1) – designated Tier 2 – review substantial surface carparking in a wide vicinity and land ownership.
Blacktown (existing R2, R4, E2 and MU1) – review current use of substantial rail lands.
Seven Hills (existing R4, E1 and E3; extensive surface parking) – review adjacent car parking and land ownership. | |

		Rooty Hill (existing R2, R4, and MU1) – review current use of rail lands. Wentworthville (existing R4 and E1) – review carpark sites on north side of station.	Granville and Granville Junction (existing R4, E1, E3 and MU1) – review adjacent car parking, rail lands, and land ownership. Clyde (existing R2, R41 and E4) – review adjacent car parking, rail lands and land ownership.	
T2 Inner West Line	*Homebush (existing R3, R4 and MU1)– designated Tier 1 – review adjacent rail lands and car park to the north of the station.* **Strathfield** (existing R1, R2, R3, E1 and MU1) – potential Tier 1. **Burwood** (existing R1, R2 and MU1) – potential Tier 1 – review land immediately to the north of the station.	*Lidcombe (existing R4 and E1) – review adjacent rail lands – designated Tier 2. Croydon (existing R2, R3 and E1) – designated Tier 2. Ashfield (existing R2, R3, E1 and E2) – review rail land at end of Nixon Avenue – designated Tier 2.*	**Lewisham** (existing R2, R4 and E1) – review rail lands to the west of the station. **Petersham** (existing R2, R4 and E1) – review rail lands to the south of the station. **Macdonaldtown** (existing R1) – review rail triangle site on eastern boundary of Burren Street.	**Newtown** (over-station to east of King Street) – investigate technical feasibility.
T3 Bankstown Line (remainder)		*Berala (existing R3, R4 and E1) – review adjacent rail lands on southern boundary*		

		of station – designated Tier 2. **Regents Park** (existing R2, R4, E1 and E4) – review adjacent rail lands to the north of station, carparking and other uses; potential Tier 2. **Birrong** (existing R2 and R4) – review adjacent rail lands on corner of Rodd Street and Hudson Parade; potential Tier 2. **Yagoona** (existing R4, B2 and RE1) – review adjacent carparking on the western and eastern sides of the station; potential Tier 2.		
T3 Liverpool Line (remainder)		**Liverpool** (existing E2 and RE1) – review adjacent carparking and other rail land. **Warwick Farm** (existing R2, R3, R4, E4 and RE1) – review extensive carparking on eastern and western sides of the station; potential Tier 2. **Carramar** (existing R2, R4, E1 and RE1) – review	**Villawood** (existing R4, E1 and E4) – review extensive carparking and other land to the south of the station, including rail lands and land zoned E1 plus land ownership investigation. **Leightonfield** (existing IN1 zone surround the station) – review land ownership and opportunities of land south	

		carparking on northern and southern sides of the station; potential Tier 2. **St Peters** (existing R2, R4, E1 and B5) – review adjacent rail land immediately north of the station.	of Christina Road and south of the station.	
T4 Eastern Suburbs Line				**Woollahra** – A Board of Review in 1976 held that the proposed Woollahra Station not be completed. Platform footing remain today. The station box is north of Wallaroy Road.
T4 Illawarra/Cronulla Line	**Sutherland** (existing E2 and R4) – review adjacent carparks; predominantly zoned R4 – potential Tier 1. **Hurstville** (existing MU1, R2, and R4) – potential Tier 1. **Kogarah** (existing E1, MU1, R2, R3 and R4) – potential Tier 1. **Miranda** (existing E2, R2, R3, and R4) –potential Tier 1.	**Waterfall** (existing C1 and C4) – review carpark sites and adjacent rail lands (for medium density). **Heathcote** (existing C1, C4, E1, E3, R3 and R2) – review carpark sites. **Loftus** (existing C1, E1, and R2) – review adjacent carpark sites. **Jannali** (existing E1, R2 and R4) – potential Tier 2. **Como** (existing C4, R2 and R3) – investigate status of	**Caringbah** (existing E2, R2, R3, and R4) – investigate extensive carparks and land ownership – potential Tier 2 (possible Tier 1).	

		sites on western side of station. **Oatley** (existing E1, R2, and R4) – investigate adjacent rail sites. **Mortdale** (existing E1, R2, and R4) – review carpark sites; potential Tier 2. **Rockdale** (existing E1, R2, and R4) – review carpark site eastern side of station Geeves Avenue; potential Tier 2. *Banksia (existing E1, MU1, R3 and R4) – designated Tier 2.* **Tempe** (existing R2 and RE2) – review carpark on western side of station. **Gymea** (existing E1, R2, R3 and R4) – review carpark to south of station. **Kirrawee** (existing E1, MU1 R2 and R4)– review carpark to west of station; potential Tier 2.		
T5 Cumberland Line (Leppington)		**Edmondson Park** (existing B4, C1 and R1) – review	**Merrylands** (existing E1, E2, R2 and R4) – investigate current development status	

		carpark sites to north of station. **Casula (**existing C1, C3, R2, R3 and RE1) – review rail carparks on western boundary of station; potential Tier 2. **Liverpool** (existing E2 and RE1) – review adjacent carparking and other rail land. **Warwick Farm** (existing E3, E4, R2, R3, R4 and RE1) – review carparks adjacent to station. **Fairfield** (existing MU1 and R4) – review carparks adjacent to station (Dale St).	and land ownership of sites to the north west of the station.	
T5 Cumberland Line (Richmond)		**Richmond** (existing E2, E4, R1, R2 and R3) – review carpark sites to north of station. **East Richmond** (existing R1, R2 and R3) – review station carpark sites. **Windsor** (existing E1, R2, R3 and RE1) – review carpark sites to north of station.	**Mulgrave** (existing E4 and RU1) – review sites adjacent to station for land ownership and housing opportunities. **Riverstone** (existing B7, E1, R2 and RU4) – review sites adjacent to station for land ownership and housing opportunities.	

			Schofields (existing B2, R2 and R3) – review current development status and sites adjacent to station for housing opportunities.	
T7 Olympic Park Line			**Sydney Olympic Park** (existing B4) – review opportunities for residential R4 development.	
T8 Airport & South Line		**Campbelltown** (existing E2, E3, E4 and MU1) – review rail carpark site to north of station. **Leumeah** (existing E3, E4, MU1, R3 and RE2) – review rail carpark sites adjacent to northern boundary of station. **Ingleburn** (existing E4, MU1, R3 and R4) – review small carpark site to south of station on Stanley Road. **Macquarie Fields** (existing R2 and RE2) – review rail carpark site on Railway Parade. **East Hills** (existing B2, R2 and R4) – review rail lands	**Macarthur** (existing E2, MU1, R4 and RE1) – investigate current development status and land ownership of sites to the north of the station zoned R4. **Panania** (existing B2, R2, R4 and RE1) – review carpark sites and ownership to north of station. **Bexley North** (existing MU1, R2 and RE1) – review sites and ownership to north of station on Kingsgrove Avenue.	

		adjacent to Park Road. **Revesby** (existing B2, R2, R4 and RE1) – carpark sites and ownership to north of station; potential Tier 2. **Padstow** (existing B2 and R4) – investigate small carpark site to north of station on Cahors Road. **Riverwood** (existing E1, R2 and R4) – review triangular carpark site to north of station. **Narwee** (existing B2, E1, R3, R4 and RE1) – review rail carpark site to north of station. **Bardwell Park** (existing C1, E1, R2 and RE1) – review rail carpark site to north of station. *Turrella (existing C1, E4, R2, R3 and R4) – designated Tier 2.*		

| T9 Northern Line | Epping (existing E1, R4 and RE1) – potential Tier 1.
West Ryde (existing MU1, R2, R4 and RE1) – potential Tier 1 or Tier 2. | Thornleigh (existing E1, E3, R2 and R4) – review adjoining rail carpark site.
Beecroft (existing E1, R2, R4 and RE1) – review rail carpark site western side.
Eastwood (existing MU1, R2, R4 and RE1) – potential Tier 2.
Denistone (existing C2, R2 and RE1) – review rail carpark site northern side.
West Ryde (existing MU1, R2, R4 and RE1) – review rail carpark site eastern boundary; potential Tier 1 or Tier 2.
Concord West (existing E1, E4, R2 and R3) – review rail carpark on eastern boundary near Victoria Avenue; potential Tier 2.
North Strathfield (existing R2 and R3) – possible infill rail site opportunity relating to Metro development – designated Tier 2. | Pennant Hills (existing E1, E3, R2, R4 and RE1) – review adjacent sites and ownership to east of station, zoned E3. | *Hornsby (existing E2, E3, MU1, R2, R3, R4) – investigate technical feasibility – designated Tier 1*
Epping (existing E1, R4 and RE1 – investigate technical feasibility. |