

DRAFT CAMELLIA-ROSEHILL PLACE STRATEGY

**Council Submission
18 March 2022**

COUNCIL SUBMISSION - DRAFT CAMELLIA-ROSEHILL PLACE STRATEGY

EXECUTIVE SUMMARY

Council thanks the Department of Planning and Environment (DPE) for the opportunity to provide comment on the draft Camellia - Rosehill Place Strategy (draft Strategy). **While Council supports the renewal of the Camellia-Rosehill precinct, it objects to the current draft Place Strategy.** The draft Strategy must be further developed to address the matters identified in this submission before it is finalised, in particular:

- a. The draft Place Strategy and masterplan do not provide sufficient detail and certainty that adequate infrastructure will be provided aligned with growth and delivered in a suitably staged manner.
- b. The draft Place Strategy has not addressed the funding gap of approximately \$416 million identified in the Infrastructure Delivery Plan which could be in the region of \$1.47 billion when taking into account remediation costs.
- c. The precinct-wide remediation strategy does not include adequate details of the extent of capping, remediation staging, governance and funding arrangements. This must be sufficiently detailed and agreed upon by key government stakeholders prior to settling on land uses.
- d. A financially feasible and deliverable traffic and transport solution must be finalised.
- e. Clear responses are required to the significant compatibility issues of locating residential development in a site constrained by flooding, contamination, fuel pipeline blast zones, and noise/ odour pollution.
- f. The proposed densities within the town centre with building heights between 80m (24 storeys) to 130m (40 storeys) and floor space ratios between 4.5:1 to 5.5:1 are not supported as they are untested and require detailed modelling that also considers the existing significant environmental constraints.
- g. The shortfall of up to 28 hectares of open space, the appropriate location of the K-12 school within or closer to the town centre, and the land allocation for the community hub must be resolved consistent with the requirements of Council's Community Infrastructure Strategy (CIS).
- h. The proposed master plan must be reviewed to ensure it delivers the optimal land use mix for the precinct including the provision of higher-order employment uses that build upon Parramatta's strong health and education sectors that would provide greater employment density and bolster innovation in Parramatta.
- i. The review required of the master plan must reconsider the scale of residential development proposed in the north-western part of the precinct, and the associated infrastructure it requires, and place greater focus on the provision of more employment compatible with the changing role of Parramatta.

The submission provides a detailed assessment of key issues arising from the draft Place Strategy including the abovementioned matters and is organised into six sections that cover Infrastructure Delivery, Land Use Planning and Urban Design, Environment, Traffic and Transport, Cultural Heritage and Implementation and Governance respectively. Council requests that the resolution of the matters identified in the submission is fundamental at this stage and must not be avoided by the inclusion of conditions within a future Ministerial Direction prior to any rezoning, the consequences of which would lead to considerable delays in future rezonings as well as poor planning and urban design outcomes. Furthermore, the DPE should note that sufficient housing and employment lands have been identified in Council's Local Strategic Planning Statement to meet DPE's identified jobs and dwelling targets for City of Parramatta for the period to 2036 without relying on any development taking place at Camellia-Rosehill.

Council requests that the DPE ensures the resultant long-standing problems that have arisen from the shortcomings of the accelerated precinct planning processes adopted for various precincts within the City of Parramatta; such as the lack of transport options at Wentworth Point; lack of employment generation at Epping town centre; and traffic congestion at Granville; are not repeated at Camellia-Rosehill and that the development of the Place Strategy is founded on comprehensive evidence-based analysis and best practice urban design and planning. Council would welcome further opportunities to meet with DPE and discuss the matters identified in this submission.

Key Issues

Section 1. Infrastructure Delivery

1.1 Addressing the shortfall in infrastructure

Open space facilities

It is concerning that the draft Place Strategy does not exhibit best practice open space provision and location. There is insufficient public open space, noting the potential shortfall of 22ha - 28.3ha of open space within the precinct. The extent of the shortfall is currently dependent on whether private open space is made publicly accessible. While demand for 72ha of public open space has been identified for Camellia, it is currently proposed to provide a range between 43.7ha to 50ha of public open space. The proposed location of the district park and sporting facilities within the Rosehill Racecourse is sub-optimal. These facilities are disconnected from the residential area and have reduced permeability and accessibility due to the interface with racecourse facilities. It is required to:

- Showcase best practice open space provision and location within a renewal precinct.
- Locate the district park, other open space and sporting facilities in highly publicly accessible locations.
- New public open space should not be located within the Rosehill Racecourse.
- Rectify the identified shortfall in open space. This requires further reviewing land-use/density assumptions to mitigate the shortfall of open space, or incorporating additional open space.
- Amend the draft Strategy and master plan to identify locations for 12 play spaces, an indoor court, two outdoor multi-purpose courts and two fitness stations as recommended in the SIIR (p.9).
- Amend the draft Strategy and master plan to make provision for dog off-leash areas, which are becoming increasingly important to the social sustainability of high-density communities.

Community facilities and school Infrastructure

It is concerning that the draft Place Strategy does not exhibit best practice community facilities and school infrastructure planning. The draft Strategy and master plan should identify the land allocation and size of the community hub. While the Social Infrastructure Implementation Report (SIIR) identified the need to provide a 4ha multi-purpose community, the hub should be sized at 4.3ha based on Council's Community Infrastructure Strategy. It should comprise of 1,885m² library space, 1,954m² community and subsidised space, and 489m² cultural space.

Concern is raised that the location of the K-12 school remains unresolved at this stage, noting that there is a demand for a primary school (2ha) and a K-12 school in Camellia. The potential location of the K-12 school in the investigation area south of Unwin Street is not a suitable site given its disconnection from community facilities, inaccessibility and the safety concerns that may arise from heavy vehicles utilising Unwin Street.

It is required DPE consult with the Department of Education and Schools Infrastructure regarding:

- Ensuring schools and community facilities are located close to new residential dwellings.
- Ensuring the suitability of the proposed school sites noting the requirements of the SINSW guidelines.
- Ensuring that schools are sufficiently sized to provide quality public education and open space.
- Facilitating shared use arrangements for open space and school facilities with the wider community.

1.2 Aligning growth with infrastructure

It is concerning that the draft Place Strategy does not sufficiently align growth with infrastructure. The timing and sequencing for infrastructure delivery needs to be further refined and clarified to support growth over time. The Infrastructure Delivery Plan (Table 11: Infrastructure responsibilities and timing') (IDP) indicates that infrastructure items will be delivered either in the medium (5 to 10 years) or the long term (10+ years), with no infrastructure to be delivered in the short term (0 to 5 years). It is required to:

- Amend the IDP to include early delivery of social infrastructure within the short-term period;
- Amend the IDP to provide refined timeframes and threshold triggers for infrastructure delivery. Dwelling and/or job numbers should reflect the threshold trigger for infrastructure delivery (e.g. Stage 1 infrastructure is to be delivered at 'x' dwellings and will support a maximum of 'x' dwellings).
- Amend the discrepancies between the Staging Plan contained in the Place Strategy (Table 3) and the IDP (Table 9) to ensure consistent advice.
- Amend Table 3 of the draft Strategy and the IDP as the proposed staging plan lacks sufficient detail to guide sequencing of development and infrastructure for the precinct. The proposed staging plan suggests concurrent development of all the sub-precincts.
- An amended staging plan needs to clarify the following: how each of the sub-precincts will be staged over time (e.g., phasing of access/road connections and unlocking development in the Town Centre); how many dwellings and/or jobs will be accommodated in each stage; and what specific infrastructure is required to support each stage of development.

1.3 Addressing the funding gap and clarifying funding mechanisms

Funding Gap

Concern is raised regarding potential funding gaps and uncertainty on decontamination cost estimates. Council **will not** bear any unreasonable financial burden in the delivery of infrastructure. The draft Strategy has not addressed the notional infrastructure funding gap of \$416 million identified in the IDP. Council officer review has identified that the funding gap could fall in the range of \$1.23 to \$1.47 billion. It is noted:

- The Remediation Implementation Report (RIR) estimates precinct remediation costs will range between \$350 to \$550m, with foreshore costs ranging from \$28.2 to \$46.7 million. This equates to a maximum total of \$600m which has not been incorporated in the forecasting of infrastructure costs in the IDP.
- Further, the IDP identifies two sources of revenue including \$305.5m under 'conditions of consent' and \$246.3m under 'local contributions'. The reference to \$305.5m under conditions of consent is unclear because this may be captured under local contributions.
- Notwithstanding the above, there is a discrepancy between what the IDP assumes can be collected under Council's Contributions Plan, overestimating the extent of contributions by approximately \$154.8M. A new Contributions Plan for the precinct would need to be developed prior to any rezoning.
- The total infrastructure funding gap can fall in the range of \$1.23 to \$1.47 billion when considering remediation costs (\$550 - \$600m), the lack of clarity on the reference to 'conditions of consent' (\$305.5m) and the gap between what can be collected under Council's existing Contributions Plan and what is stated in the IDP (\$154.8m).

It is recommended to further clarify the next steps for infrastructure planning, in alignment with currently proposed infrastructure planning reforms, and how the funding gap will be addressed.

Establishing greater certainty on the implementation of funding mechanisms

The draft Strategy has identified the potential use of a 'key sites' provision. This is whereby a developer provides relevant infrastructure on or adjacent to the development site that has a broader public benefit in exchange for the right to develop and/or intensify the land use. In cases where the key sites provision is not utilised, alternative funding mechanisms including local and regional infrastructure contributions and special local area rates (special rates) could be relied upon instead. Special local rates would be applied for works or services limited to a specific area that will benefit from the proposed infrastructure. This will require an application to the Independent Pricing and Regulatory Tribunal (IPART) and Council agreement/endorsement. The estimated income from the special rates is difficult to determine and requires further investigation. It is required that:

- The draft Strategy identifies the notional funding gap and the potential actual gap as identified above.
- Further investigations on proposed funding mechanisms (e.g. income that could be derived from special local area rates) must be undertaken prior to rezoning.
- Funding arrangements must be resolved and put in place before rezoning of the precinct, to ensure that Council is not unreasonably burdened by any infrastructure funding shortfalls.

Section 2. Land Use Planning and Urban Design

2.1 Determining the appropriate land use mix for Camellia

It is uncertain whether the master plan reflects the optimal land use mix in the context of maximising job density, managing residential development impacts and mitigating the funding gap. It is therefore required that:

- The Economic Analysis should further interrogate the appropriate land use mix for Camellia and consider options to introduce higher order uses (e.g. health, education and innovation uses) that would complement the growth of Parramatta. This would assist in addressing master planning issues whereby there is an over-reliance on high densities within the north-western portion of the precinct to fund infrastructure. This is acknowledging that this will need to balance the protection of crucial, long-standing heavy industries that service the broader region.

2.2 Providing a clear strategy to address serious environmental compatibility issues

There is a poor relationship between the identified principles and the proposed spatial outcomes as represented in the indicative master plan. **This brings to question whether the design intent can be delivered with any rigour.** The gap pertains to the fact that indicative built form parameters have been canvassed without first resolving feasibility and environmental compatibility issues. The draft Strategy must address the serious environmental compatibility issues of locating residential development in a highly constrained site. To inform the master planning process, it is required to address below issues in order of priority:

- a. Establish a precinct-wide strategy for resolving environmental compatibility issues – Informed by technical studies, this precinct-wide strategy will need to establish guidance that determines levels for the entire precinct in response to flooding/contamination constraints, identifies appropriate setbacks and development types in relation to pipelines and odour/noise sources from continuing industrial uses within the precinct, map ecological assets, etc., and not risk the resolution of these issues be left to the behest of site-by-site development proposals.
- b. Establish a transport and structural framework - This requires advanced resolution of the structure and staging of the internal street network, alongside a commitment to transport infrastructure (PLR Stage 1 and 2), to service the future population.
- c. Establish parameters for the public domain – This will require preparing a Public Domain Strategy for the precinct, noting that the scope, staging and delivery of the active town centre core and associated public domain areas remain undefined.
- d. Establish principles for built form and density - The above elements must provide the context and certainty, before determining the appropriate design response to guide future development.

2.3 Premature development standards that may result in poor built form and amenity

In their current form, the indicative development standards are not supported on the below grounds:

- Further consideration needs to be given to the role and hierarchy of the Camellia Town Centre and the suitability of the indicative building heights and floor space ratios. The proposed height and floor space ratios are comparable to planning provisions within CBDs and will result in excessive densities within the town centre. This is not appropriate given Camellia's location on the fringe of the Parramatta CBD.
- It is unclear how the building heights and density/floor space controls were formulated, and whether they respond positively to the site context. This includes complex level changes associated with remediation and flood mitigation and the implications for the density that can be accommodated in the Town Centre.
- The development standards are unlikely to deliver a quality urban environment. The built form outcomes in Figure 14 do not appear to comply with the Apartment Design Guide / reflect clear organisational principles or rational structural hierarchy to the streetscape.
- The draft Strategy and master plan have not contemplated the location and land take required to accommodate decoupled parking and community facilities in the precinct.

It is required to:

- Omit development standards and density assumptions contained in the draft Strategy, specifically Figure 14 and Table 1. This would enable greater flexibility for future master planning to holistically respond to environmental matters, in particular, the constrained character of the precinct.
- Amend the key principle to 'create a density of development that corresponds with the projected capacity of the transport network, social infrastructure, desired future character and [environmental constraints of the precinct]' [added text].
- Amend the plans included in the draft Strategy to be diagrammatic only, focusing on establishing well-resolved structural elements for the precinct and reflecting the vision and principles within the document.
- Expand on design principles for desired built form typologies in place of what appears to be prescriptive building heights and footprints. Design principles can include but should not be limited to the following:
 - a. supporting taller buildings (where appropriate) of a slender and more elegant form;
 - b. maximising potential amenity and environmental performance;
 - c. allowing for street wall heights to proportionally respond to street widths; and
 - d. mitigating the impact of buildings on the public domain and streetscape experience.
- Work with Council officers to complete relevant modelling to test and develop suitable development standards for the precinct.

2.4 Planning for affordable housing and housing diversity

The draft Strategy earmarks the future delivery of diverse housing including student accommodation, build to rent and affordable housing among others. The draft Strategy provides that at least 5% of housing will be provided as affordable housing. It is required that planning controls under Direction 4:

- Include key principles that will guide the location and provision of affordable housing (i.e., to be located within walking distance of amenities such as public transport, shops and employment areas).
- Note the provision of student housing near amenities could contribute to the night-time economy, establishment of innovation spaces and future partnerships between industries and universities.
- Includes mandatory provisions for affordable housing to be provided in perpetuity.
- Enables a higher rate of provision that is higher than 5% where it is determined to be feasible (i.e., higher rate of provision for sites with a larger site area or where there are greater height and FSR incentives).
- Include more detail on the desired housing typologies for the precinct.

2.5 Managing land-use conflicts

In relation to managing land-use conflicts, it is required to address the following:

- Identify proposed measures to ensure that existing industrial and racecourse uses will not adversely impact future residential areas.
- A portion of land along the northern periphery (i.e. George Weston site) has been earmarked for residential development despite having been identified as an area subject to medium and high odour risk. The introduction of less sensitive land uses or staging of development should be carefully considered to mitigate potential odour impacts.
- Consider re-zoning land along the southeast periphery of Camellia (i.e. part of the VIVA Energy site) as urban services land. This would result in a more centralised heavy industry area for Camellia. Existing use rights would enable the retention of important heavy industry uses but the revised land-use zone would enable urban services at the periphery in the longer term.
- Planning controls under Direction 4 should draw from the discussions and recommendations of the Qualitative Hazard Assessment Report, Noise and Vibration Implementation Report and Air and Odour Implementation Report. The draft Strategy has incorporated only some of the recommendations.
- Action 2 under Direction 4 to 'investigate and consult with business and landowners regarding how current odour and air emissions can be mitigated' – should occur prior to rezoning.

2.6 Establishing the Night-Time Economy and ensuring safety within the precinct

While the precinct vision entails building a vibrant night-time economy, it is generally limited to the Town Centre/Entertainment sub-precinct. It is important to avoid the creation of ‘dead zones’ whereby urban services and industrial land can become perceived as unsafe and unattractive at night.

It is required to amend the draft Strategy to address the following:

- Amend principles under Direction 2 to include consideration of ‘facilitating opportunities to build the night-time economy within but not limited to the Town Centre and Entertainment sub-precincts’.
- Amend planning controls under Direction 4 to identify indicative ‘late-night trading areas’ within the broader precinct.
- Amend the staging plan to consider the establishment of night-time venues in the early stages of development; capitalising on the availability of land close to the Parramatta CBD and transport routes.
- Amend the principle under Direction 4 to ‘create a comfortable, [safe] and friendly public domain and street network that encourages and supports walking, cycling and the use of public transport [in the day and night]’ [added text].
- Include an action under Direction 4 to ‘ensure the future Public Domain Strategy addresses design requirements (e.g., lighting and signage) for safe pedestrian and cycle routes/connections to and from the Town Centre and Entertainment sub-precincts from all directions’.
- Include additional planning controls under Direction 4 to identify ‘safe routes’ to and from the Town Centre and Entertainment sub-precincts from all directions. This will ensure safety at night and promote a vibrant night-time economy.
- Amend the principle under Direction 4 to provide ‘built form controls that promote framing of open space and public space to promote activation and passive surveillance [including active transport links within the industrial and urban services area]’ [added text].
- Amend the draft Strategy to include design principles/place outcomes for the Entertainment precinct. This can include placemaking initiatives that consider the experience of the precinct at night. Installations and public art projects could renew and reinforce the precinct’s unique character and the night-time economy.
- Where the K-12 school is better placed closer to the Town Centre amenities, it may be appropriate to consider land uses south of Unwin Street that would complement the night-time economy. This would extend the boundary and extent of the Entertainment sub-precinct.

Section 3. Environment

3.1 Clarifying Council's role and liability in implementing and monitoring orderly site remediation

Council's role and liability regarding residual contamination

Allocation of any residual contamination liabilities for the precinct to Council is outright objected to. It is noted that the cost analysis identified in the RIR is likely to be an underestimation due to the uncertainty around the volume and extent of contamination across the precinct. This should be the role of the State Government.

Clarifying governance arrangements

The Remediation Implementation Report (RIR) identifies the option of authorising the City of Parramatta to oversee the precinct contamination management protocols. Council strongly objects to such an arrangement and must not be burdened with onerous ongoing monitoring, management and maintenance of residual contamination due to the uncertainty around contamination volume and extents, remediation costs and financial and legal liabilities. This is not the role of Council. The legislative authority for the management of significantly contaminated land in NSW is the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997* (CLM Act). The precinct is identified as significantly contaminated land by the NSW EPA with several sites subject to regulatory orders from the NSW EPA.

Council has no legal powers or financial resources under the CLM Act to manage remediation of contaminated land on such a scale. The most appropriate approach is for this to be managed directly by the State Government.

3.2 Clarifying site-remediation and ongoing costs

Land constraints and ongoing maintenance costs will need to be understood by Council when considering proposals for land dedication if they are to be accepted. It is acknowledged that their RIR identifies the estimated costs of precinct-wide remediation will range from approximately \$350M to \$550M which excludes the costs of foreshore remediation. Foreshore remediation costs along Parramatta River, Duck Creek and Duck River are estimated between \$28.2M to \$46.7 million but this does not include maintenance costs.

It is required that the RIR clarify if it covers all relevant costs including the following:

- costings for ongoing management of a Long-Term Environmental Plan;
- contingency to address uncertainty around the nature and volume of contaminated fill, groundwater and residual contamination;
- biannual/quarterly inspections of any surface capping layer/subsurface impermeable geomembrane filter;
- reporting of the inspection monitoring results;
- follow up inspections;
- soil validation and analysis;
- imported source material reviews;
- scientist / Engineer rates;
- rectification works;
- repair and/or replacement of adopted remediation technologies; and
- cost of remediation technology feasibility and or pilot studies.

3.3 Ensuring feasible and effective implementation of a net-zero carbon precinct

The precinct vision to implement a net-zero precinct by 2050 is broadly supported, but the Australian Climate Council recommendation for net-zero emissions by 2035 is preferable.

It is required to address the following:

- Planning controls under Direction 5 should include the following measures: future-proofing all-electric building design, zero-emissions material selection, and street design that enables sufficient soil volume to optimise street canopy cover.
- Include an action under Direction 5 to expand on the SIR and its discussion of the associated costs and feasibility of the implementation measures recommended to implement a net-zero carbon precinct. In its current form, the SIR and IDP do not provide any guidance on the costs associated with the recommended sustainability measures and infrastructure.

3.4 Clarifying durability and warranty of capping layer

The RIR advocates the use of impermeable geomembranes and engineered impermeable barrier walls:

It is required that the RIR review the durability of these technologies, their capacity to remain functional, without requiring excessive maintenance/repair, and provide details on their design lifetime.

3.5 Addressing contamination within, and stewardship of, Camellia wetlands

While Council is open to facilitating ongoing discussions with VIVA Energy regarding potential public access to the wetlands, it is required to consider the following:

- Consult EPA with a view to assessing which agency is appropriate for overseeing the wetlands;
- Include the wetlands in the scope of future contamination protocols; and
- Consider the wetlands adjacent to Parramatta River may fall under the responsibility of Maritime NSW.

3.6 Future proposals for land dedication

The principle to ensure 'land is assessed and remediated/managed so that is it suitable for the proposed land use and that the contamination does not present an unacceptable risk to human health or any other aspect of the environment' is strongly supported. It is required to address the following:

- The principle under Direction 5 notes 'residual contamination liabilities should be appropriately identified, apportioned, funded and governed' is acknowledged. Note that unreasonable apportionment of responsibility to Council in this regard would not be supported.
- An overarching State body or authority with legislative powers should be assigned or created to govern the contamination protocols across the precinct.
- Amend the RIR to calculate all costs as identified in Section 3.2 – Clarifying remediation costs.
- Provide clarity on estimated costs of remediation noting that Figure 9 – Draft Master Plan cost estimates of the RIR is not fully legible, and the information may be better represented in a table or pie graph with clear numeric estimates.
- Amend the RIR to address the warranty, durability, and lifetime of the capping layer.
- Action 6 to 'explore opportunities for the development of a funding framework' should entail Council involvement and input into the framework.
- Action 2 to 'investigate governance mechanisms for precinct wide remediation and/or contamination management activities' is noted. This should entail Council input and feedback.
- Action 4 to 'work and consult with landowners to stage remediation appropriately' is noted. This should entail Council involvement and input into a staging framework for the precinct. This consultation should occur before rezoning and at the development applications stage. It may be appropriate to consider the role of any future governance body to work with landowners and coordinate the staging of development to avoid land-use conflicts during remediation.
- Planning controls under Direction 5 include 'establishing a staging and sequencing framework to guide remediation and/or management activities to avoid land-use conflicts'. The RIR should expand on the experience of the Homebush Bay and Rhodes peninsula redevelopment, to inform the formulation of the staging framework for Camellia.
- Action 9 under Direction 1 entails 'facilitating ongoing discussion between Viva Energy and City of Parramatta to explore the possibility of opening the Viva wetlands for public access.' This should be

amended to include the involvement of the Environment Protection Authority (EPA) acknowledging that there are existing notices on the land, and the issue may fall within the purview of Maritime NSW.

- Amend the RIR and IDP to address contamination extents and costs associated with remediation and management of the wetlands.
- Amend the RIR to include discussion on past precedent in relation to the use of various funding mechanisms (e.g. the experience of Homebush Bay/Rhodes peninsula redevelopment). This can inform Action 6 under Direction 5 to explore opportunities to develop a funding framework for remediation works.
- Consider funding mechanisms whereby future developments could fund ongoing maintenance costs. This entails assuming medium-high density developments whereby, for instance, ongoing costs associated with foreshore land could potentially be funded as part of strata title arrangements.

3.7 Addressing flood risks and integrated water management for Camellia and its surrounds

From a flood risk perspective, the proposed location of the Town Centre is sub-optimal as the whole town centre is subject to PMF flooding and parts of it are subject to the 1 in 100-year flooding and high hazard flooding. It is required to address the following:

Flooding within the Camellia Town Centre

- Clear analysis of flood risks is required and must be addressed in the final Place Strategy.
- If it is proposed to maintain the current location of the Town Centre, it is recommended to use fill to create a landform above the PMF flood level within the Town Centre area. Critical or sensitive land uses (i.e., the primary school, childcare facilities, clinics, electric sub-stations, telecommunications) will need to be located on this landform. This would effectively create an area that will remain flood-free under all circumstances and continue to provide essential community services. It would also serve as a location for people within Camellia to use as a temporary refuge. DPIE should include this as part of planning controls under Direction 5 and ensure that it is within the scope of the precinct wide Flood Risk Study and Plan including the detailed flood model.
- In relation to Action 1 'to prepare a precinct-wide flood risk study and plan', the detailed flood modelling will also need to determine the impacts of proposed filling and creation of this platform and include mitigation solutions to compensate for on-site and off-site impacts for all events up to and including the PMF. This technical work should be completed prior to the finalisation of the Strategy as part of a precinct-wide environmental management strategy.
- Consider that the creation of this landform presents the advantage that contaminated/remediated soil from elsewhere in the precinct could be used, which could potentially reduce off-site disposal costs. It may also provide a raised viewing point for the entire precinct along the Parramatta River.
- Include an action under Direction 5 to consult with NSW SES and other emergency services authorities to obtain their advice on this fill approach and access requirements during flood events.
- Planning controls under Direction 5 include 'establishing shelter in place strategies for new development where necessary'. These controls should implement key principles of shelter in place:
 - a. the building must be designed so that it is structurally stable during all possible flood events;
 - b. there are locations in the building that is above the PMF and provided with necessary amenities (i.e. power, lighting food, water);
 - c. future height strategy will need to account for this (i.e. every building will likely need to be at least two storeys in height to enable shelter in place above the PMF flood waters); and
 - d. the public domain including areas outside the building to be designed appropriately and have the capacity to house additional people who need shelter and are unable to reach an area above the PMF.
- Include an additional action under Direction 4 requiring the preparation of a public domain strategy that investigates design considerations for flood-resilient buildings, parks and landscapes.
- The precinct-wide flood risk study will need to assess the proposed land uses within the precinct and confirm that the proposal can achieve consistency with Ministerial Direction 4.3 and the Flood Development Manual 2005.

Flooding within the Urban Services and Industrial Areas

- In relation to urban services and industrial areas, the following mitigation measures must be considered:
 - a. Where possible, provide a flood-free evacuation route to a flood-free area.

- b. Where it is not possible to provide a route to a flood-free area, every new building should be built using shelter in place principles.
- c. Consider if a landform above the PMF flood level can be built as an area of refuge (similar to that recommended for the Town Centre).

Integrated Water Cycle Management

- Amend the exhibited Integrated Water Cycle Management Implementation Report and planning controls to expand the discussion on this issue. Further assessment and implementation measures should be informed by the Weber and Ramilo (2022) methodology which covers the following: sustainable supply options, improved wastewater treatment, stormwater quality improvement and hydrologic management as overarching objectives.
- Consider the precedent of Fishermans Bend, Melbourne to inform future planning controls relating to integrated water cycle management.

Section 4. Traffic and Transport

4.1 Future-proofing Camellia by providing for future addition of a Metro station in the longer-term

The draft Strategy does not consider the provision for the future addition of a Metro station.

It is required to amend the draft Strategy and ensure the integrated transport study considers, at a minimum, the provision for the later addition of a Metro Station in Camellia to futureproof sustainable travel for Camellia-Rosehill.

4.2 Completing traffic/transport investigations to ascertain appropriate land uses and densification

The draft Strategy and exhibited Traffic and Transport Implementation Report (TTIR) have identified a range of potential transport initiatives required to support the precinct. It is required to address the following:

- Amend Action 1 to reflect Council's involvement and input into the integrated traffic and transport study to ensure predicted impacts are appropriately minimised and managed. This technical work should be completed prior to the finalisation of the Strategy.
- Ensure the scope of the integrated traffic and transport study covers the following:
 - a. Issues that may arise from Carnarvon Street becoming a rat run for traffic from Parramatta Road;
 - b. Address issues of congestion on Grand Avenue;
 - c. Address feasibility and appropriateness of future proposals for decoupled parking;
 - d. Resolve the internal street network and interface with the broader network.
 - e. Determining appropriate street profiles/ road intersections acknowledging the role of street design in assisting with contamination and water management in the precinct.
 - f. Consider potential grade separation of the intersection at James Ruse Drive (JRD), Hassall Street and Grand Avenue.
 - g. Further resolution of investigation areas located on Rosehill Racecourse and residual Metro West land to determine transportation needs and impacts on the precinct and broader network.
 - h. Determine appropriate parking allocation rates for all proposed uses within the precinct, as the employment of Parramatta CBD rates may not be suitable for the context of Camellia.
 - i. Investigate the application of travel demand management (TMD), which applies a focused, data-led strategy that seeks to change network demand by redistributing journeys to other modes.
- Amend the draft Strategy (Figures 9-10) and the exhibited TTIR to address active transport issues:
 - a. Provide a network of cycleways and include staging details and addressing topography constraints.
 - b. Include improved access to the existing path on eastern side of the JRD bridge over the river.
 - c. Strategic bridges should be included to complete loops and avoid unnecessary dead ends as indicated close to Wentworth Street along Duck Creek/A'Becketts Creek.
 - d. Principles under Strategic Direction 3 should entail the early delivery of active transport connections.
- Include an action under Strategic Direction 3 to investigate the establishment of a Travel Management Association (TMA) for Camellia.

- Amend the exhibited Integrated Master Plan document given that the proposed street profiles appear generic without consideration of how street design can assist with contamination and water management.
- Amend Section 2.4.2.2 of the TTIR and Public Transport section of the draft Strategy to emphasise that commitment of PLR Stage 2 will be critical to servicing proposed dwelling and job densities in Camellia.

4.3 Improving accessibility and land-use and transport integration in the Camellia Town Centre

The proposed masterplan raises several issues relating to accessibility and integration for the town centre:

- The complex, unresolved street network is likely to detriment the future accessibility of the Town Centre.
- Residential areas situated between James Ruse Drive (JRD) and Parramatta Light Rail (PLR) is effectively isolated from surrounding areas.
- The accessibility and integration of the community hub, light rail stop and the adjacent sewage pumping station will need to be resolved given the anticipated level changes between these uses.

It is required to ensure the future integrated transport study:

- determines options to optimise accessibility to, from and within the Town Centre;
- determines a legible and accessible street network within the Town Centre;
- determines access options for future development located between JRD and PLR;
- optimises accessibility/ integration of the community hub with the light rail and sewage pumping station.

Section 5. Cultural Heritage

It is required that:

- The final Place Strategy reinforces the need to protect heritage items in the precinct.
- Further review is undertaken in relation to including a methodology that would allow protection of the potential archaeology in the precinct.

Section 6. Implementation and Governance Arrangements

Council's Role in Implementation and Governance

To implement the draft Strategy, it is expected that a section 9.1(2) Ministerial Direction will be introduced requiring planning proposals to be consistent with the draft Strategy. To enact the Strategy, Council or DPE will amend the Parramatta LEP through a planning proposal process. It is required that:

- All technical work is completed, and outstanding issues are addressed before considering the finalisation of the draft Place Strategy. **No Ministerial Direction should be issued until all matters are resolved.**
- Ensure Council's involvement and input into technical studies, future stages of detail master planning/modelling and preparation of any rezoning package.

Attachment 1 – Additional Detailed Comments relevant to Place Strategy

Infrastructure Delivery

- In relation to delivering foreshore access, there are potential large tracts of land that will not be re-developed in the short term. It is important that where redevelopment is proposed, the following occurs: arrangements are made for the remediation, dedication, embellishment and long term maintenance of the foreshore area.

'Ensuring foreshore access as part of any future redevelopment of land' will need to be facilitated in an integrated manner with regard to the temporal nature of redevelopment and how the space might be used in the short to long term. The delivery of foreshore access will require further investigation in terms of appropriate staging/sequencing of public spaces and integrated pedestrian/cycle links along the foreshore.

- The draft Strategy should reconsider the proposed size of open space areas, in particular, Local Park 3 in Figure 53 which is less than 0.3ha. All local parks should not be less than 0.3ha as it needs to be sufficiently sized to be usable open space – consistent with Council's Community Infrastructure Strategy (CIS).

Land Use Planning and Urban Design

- In relation to the proposed zoning of entertainment sub-precinct/Rosehill Racecourse, DPE must ensure that the SP3 Tourist and Visitor Accommodation zone does not permit other types of residential development apart from short-stay accommodation. Otherwise, any additional densities (e.g. should residential flat buildings be made permissible under the SP3 zone) will need to be accounted for under planning assumptions and calculating infrastructure demand.
- Any sites that are proposed to be dedicated to Council as public open space will need to be zoned RE1 Public Recreation.
- The planning assumptions underpinning job numbers for the precinct need to be clarified. The draft Strategy should identify the quantum of different land uses (i.e. quantum of land zoned for heavy industry, urban services, commercial/retail uses) within the precinct and associated planning assumptions (ratio of jobs to floorspace). Furthermore, the Economic Analysis and Implementation Report should be amended to include the current master plan as shown in the draft Strategy.
- Consistent with stated objectives to ensure the delivery of housing diversity in the precinct, the draft Strategy should define the desired housing typologies for Camellia.
- In relation to the wetlands, the draft Strategy should consider a longer-term aspiration for the provision of regional open space in Camellia. This would be consistent with the identified action to facilitate public access to this environmental asset. The protection and rehabilitation of the wetlands and future retrofitting industrial land could open opportunities for providing significant regional open space for the community in the long term.
- Planning controls relating to land-use conflicts should take into account all recommendations of the technical reports as only some of the identified measures have been incorporated into the draft Strategy.
- The Camellia-Rosehill precinct is strategically located adjacent to the Parramatta CBD and Western Sydney University and is within proximity to the Westmead Innovation Precinct on the western side of the Parramatta CBD.

In its current form, the Draft Strategy does not include consideration of Smart City initiatives. A significant opportunity exists to strengthen the provision of “smart” elements within the Draft Strategy and for Camellia to be a new Smart urban growth precinct. The precinct is well-positioned to support a substantial proportion of the 14,500 future jobs planned for the Camellia-Rosehill area to become Smart jobs and for the 10,000 new homes to be Smart development.

It is recommended that DPIE liaise with the “Smart Places” DPIE team to explore potential opportunities relating to Camellia becoming a new Smart urban growth precinct.

Environment

- The draft Strategy should reconsider the proposed size of open space areas, in particular, Local Park 3 in Figure 53 which is less than 0.3ha. All local parks should not be less than 0.3ha as it needs to be sufficiently sized to be usable open space – consistent with Council’s Community Infrastructure Strategy (CIS).
- Planning controls will need to consider easements to accommodate and allow servicing of groundwater remediation technologies along the foreshore area if these technologies are to be pursued.
- There needs to be a consistent street edge to the foreshore land (not just along the northern periphery close to the town centre) to optimise public access and legibility of public spaces from private development.
- The water recycling facility in Camellia is broadly supported to enable the establishment and growth of circular economies in the precinct.
- It is recommended to correct the reference to City of Parramatta’s Environmental Sustainability Strategy which is currently referenced as Sustainability Strategy on pages 22 and 58 of the draft Strategy.

Traffic and Transport

- As identified in Council’s previous submission, the proposed route option running along Grand Parade (Option B) is Council’s preferred alignment for the Parramatta Light Rail Stage 2 (PLR 2). The alternative route along the foreshore (Option 2C) raises the risk of precluding recreation and open space opportunities. Broadly, the route should generally follow an extended alignment along Grand Avenue to connect Camellia as part of PL2 for the proposed rezoning to be viable.
- Identified initiatives to improve transport connectivity to surrounding areas in particular Rydalmere is broadly supported.

Cultural Heritage

- **Non-aboriginal archaeology** - It is recommended to include a methodology that would allow protection of the potential archaeology based on the recommendation of the PHALMS 2000. The Archaeological Management Units “AMU” of Parramatta Historical Archaeological Landscape Management Study “PHALMS” 2000 - show that Archaeological research potential is held in a part of the site and this will require procedures to be developed and adopted if recovery and salvage would occur.

The methodology and management to be adopted for potential salvage would need to be addressed as part of the Camellia-Rosehill Strategy. In cases where deposits, relicts or sandstone material are discovered or recovered during the investigation, and redevelopment of the Camellia-Rosehill area, these findings could inform further stages of design/development and be integrated within the heritage interpretation of the precinct and sites.

- **Heritage Archival Recording and Salvage Report** - It would be likely that within the AMU (AMU 2692 to AMU 2698) which hold moderate or little archaeological research, that potential some sandstone material could be salvaged and/or recovered (noting about 73 pallets of sandstone from the PLR project are currently stored in the Rosehill Station).

In the event that sandstone material is recovered, a methodology for salvage and recovery should be prepared and integrated within the strategy along with a Heritage Archival Recording and Salvage Report. This should be consistent with the relevant NSW Heritage Office guidelines including *How to Prepare Archival Recordings of Heritage Items (NSW Heritage Office 1998)* and *Photographic Recording of Heritage Items Using Film or Digital Capture (NSW Heritage Office 2006)*.

The Heritage Archival Recording and Salvage Report should provide the following:

- A historical background of the study areas;
 - The results of documentary and database reviews of former heritage studies, and searches of statutory and non-statutory heritage registers;
 - Results of a site inspection of the study areas;
 - An assessment of the significance of the study areas;
 - A photographic record of the study areas;
 - A summary of heritage fabric salvaged from each study area or as part of the wider enabling works program;
 - A catalogue sheet of the photographs with an aerial map of the location and direction of the photographs taken; and
 - An attached CD of all images.
- **Salvaged sandstone material** - Salvage materials such the sandstone blocks can be adopted or reused within the precinct, i.e. in public spaces and buffer zones, or eventually donated for another restoration project within our LGA.

Recovered sandstone material that cannot be re-used within the precinct should be used within Parramatta LGA, and if suitable, it can be donated to Deerubbin LALC as the owner of the Parramatta Gaol complex for re-use and/or transferred on pallets for long-term storage to another significant precinct/project such as the Parramatta Gaol complex.

- **Aboriginal Archaeology** - There are 2 Aboriginal archaeological sites located within the precinct:
 - AHIMS 45-6-2559 is recorded in the Rosehill Gardens Racecourse carpark on the southern side of Grand Avenue North.
 - AHIMS 45-6-3627 is recorded within the grounds of the former Parramatta Speedway, now being developed as the Clyde stabling and maintenance facility.

Consistent with the requirements under the terms of the *National Parks & Wildlife Act 1974* and to include the research into the archaeological record, it is recommended to undertake the following:

- Aboriginal Consultation;
- Test Excavation;
- Aboriginal heritage induction to all employees, contractors and contractors engaged on the project;
- Unexpected Finds and Human Remains Procedure.

Mapping

- The mapping contained within the draft Strategy will need to further acknowledge flood and endangered wetlands beyond what is currently mapped is required – especially coastal wetlands at the confluence of Duck Creek and Parramatta River.
- The mapping of open space areas will need to reflect appropriate sizing, in particular Local Park 3 which must be sized at 0.3ha as a minimum to meet the requirements of the CIS.
- The community hub should be indicated on the draft master plan to provide certainty on its location and land take.
- The draft Strategy will need to provide contextual information to the flood maps provided so that a general interpretation of risks and how it affects land-use decisions can be communicated.