THE GPT GROUP

SUBMISSION TO GREATER PARRAMATTA PRIORITY GROWTH AREA INTERIM LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN
TABLE OF CONTENTS

1. Introduction ........................................................................................................................................... 1
2. Transport and Infrastructure .................................................................................................................. 4
  2.1. equity in Infrastructure Provision .................................................................................................... 4
2.2. Transport Infrastructure ...................................................................................................................... 6
2.3. Sydney Metro West .............................................................................................................................. 6
2.4. Parramatta Light Rail .......................................................................................................................... 7
2.5. Corridor Protection ............................................................................................................................. 7
2.6. Social Infrastructure ........................................................................................................................... 7
3. Governance ........................................................................................................................................... 9
  3.1. Growth Infrastructure Compacts ......................................................................................................... 9
3.2. Funding & Value Capture .................................................................................................................... 9
3.3. Special Infrastructure Contributions .................................................................................................. 9
3.4. Cost of Development .......................................................................................................................... 10
3.5. Rezoning and Uplift Pathways ............................................................................................................ 10
3.6. Development Approvals Pathways ..................................................................................................... 11
4. Future Planning ..................................................................................................................................... 12
  4.1. Autonomous Vehicles ....................................................................................................................... 12
4.2. Autonomous Trucks & Dark Warehouses ......................................................................................... 12
5. Sydney Olympic Park ............................................................................................................................... 13
  5.1. Sydney Olympic Park Role and Function ......................................................................................... 13
5.2. Job Creation ....................................................................................................................................... 13
5.3. Education Infrastructure .................................................................................................................... 13
5.4. Timing is Critical ................................................................................................................................ 14
6. Camellia ................................................................................................................................................. 15
  6.1. Industrial Demand remains High ...................................................................................................... 15
6.2. Support for Transformation .............................................................................................................. 15
6.3. Land Use Conflicts ............................................................................................................................ 15
7. Parramatta CBD ....................................................................................................................................... 16
8. Conclusion ........................................................................................................................................... 17
Disclaimers ............................................................................................................................................... 18

FIGURES:
Figure 1 – Location of GPT Assets within the Greater Parramatta Priority Growth Area ......................... 2
Figure 2 - Location of GPT Assets within the GPOP Sub-Precincts .......................................................... 3
Figure 3 – Location of GPOP and East Sydney Study Areas (SGS) ............................................................ 4
Figure 4 – Existing Social Infrastructure Comparison ................................................................................ 5
1. INTRODUCTION

The GPT Group (GPT) is a listed property group. GPT is an active owner and manager of a $11.1 billion diversified portfolio of high quality Australian retail, office and logistics property assets and a Funds Management platform with $10.4 billion of property assets under management.

GPT has a keen interest in the regulatory and policy framework impacting its assets, including strategic and statutory planning. GPT has long favoured a proactive and cooperative approach to working with all levels of Government to achieve the highest quality outcomes for all stakeholders. This is evidenced in GPT’s delivery of highly successful, city-shaping projects in locations as diverse as Rouse Hill, Charlestown, Macarthur and Wollongong.

GPT has appointed Urbis to assist in developing a whole-of-business response to the Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan (the Plan). Urbis brings an appreciation of the strategic and statutory planning process, while GPT brings deep expertise across a range of asset classes, and a knowledge of individual assets, which has been extensively drawn upon in the preparation of this submission.

GPT assets that are within the Greater Parramatta Priority Growth Area (GPPGA) are mapped in Figure 1, and are identified as:

- Quad Business Park (Sydney Olympic Park)
- 3 and 5 Murray Rose Avenue (Sydney Olympic Park)
- Sydney Olympic Park Town Centre (Future)
- Rosehill Business Park
- 4 Holker Street, Newington
- 83 Derby Street, Silverwater
- 32 Smith Street, Parramatta

GPT is highly supportive of the Department’s initiatives to support a productive, liveable and sustainable Sydney. The strategic framework of establishing Priority Growth Areas to facilitate the rezoning and strategic planning of large areas of land is supported. The GPPGA has an important role to play in achieving the Greater Sydney Commission’s vision as outlined in A Plan for Growing Sydney, and GPT is supportive of the Plan’s intended role to integrate land use and transport planning.

The current Plan exhibition and engagement process is intended to draw out comments, ideas and concerns to inform the final plans in late 2017. GPT appreciates the opportunity to provide written input into this process.
Figure 1 – Location of GPT Assets within the Greater Parramatta Priority Growth Area

Source: Urbis
Figure 2 - Location of GPT Assets within the GPOP Sub-Precincts

Source: Urbis
2. TRANSPORT AND INFRASTRUCTURE

2.1. EQUITY IN INFRASTRUCTURE Provision

A report titled ‘Connecting Sydney Olympic Park and GPOP with Greater Sydney’ commissioned by the Sydney Olympic Park Business Association and authored by SGS Economics and Planning, compared 4000ha of ‘East Sydney’ land with the GPPGA, to understand the relative provision of infrastructure in the GPPGA to a more established part of Sydney largely focussed around the City of Sydney LGA.

Figure 3 – Location of GPOP and East Sydney Study Areas (SGS)

Source: SGS Economics and Planning report for SOP Business Association, ‘Connecting SOP and GPOP with Greater Sydney’

The SGS report highlights the under-provision of all forms of infrastructure across the GPPGA relative to East Sydney, as outlined in the following sections of this submission.

SGS notes that forecast 2041 population of GPOP is 278,000, which is similar to the current population of the East Sydney study area (263,000). If GPOP is to grow to support the population that East Sydney supports today, investment in a range of social infrastructure will be required to meet the levels provided in East Sydney today (refer Figure 4 overleaf).

In addition, transport connectivity will drive the successful development of the GPPGA, facilitating growth in economic activities and supporting the growing local community. The report argues that the GPPGA’s significant cluster of centres requires investment similar to that which has occurred, and is occurring, in East Sydney. This requires clear planning and integration of regional, district and local transport networks, in line with changing or expanding land uses, to support various accessibility needs of residents and businesses.

This inequity of infrastructure provision needs to be addressed by State and Commonwealth Governments, to facilitate the successful revitalisation of the GPPGA and to ensure that future workers and residents of the area enjoy a high level of amenity and quality of life.
Figure 4 – Existing Social Infrastructure Comparison

Source: SGS Economics and Planning report for SOP Business Association, ‘Connecting SOP and GPOP with Greater Sydney’
2.2. TRANSPORT INFRASTRUCTURE

Efficient and interconnected transport networks provide equitable access to jobs, education, retail, recreation and services, and a means for distribution of freight to industry, businesses and homes. A robust hierarchy of transport networks – rapid cross-district, and smaller local connections – are essential to connect and leverage public and private investment in centres.

SGS’s report prepared for the SOP Business Association highlights the accessibility imbalance compared with East Sydney, noting that:

A larger share of the resident population in East Sydney catch public transport or walk to work compared to residents in GPOP: 57% for East Sydney versus 40% for GPOP. Workers based in GPOP are much more reliant on cars to get to the precinct: 75% of workers based in GPOP use private transport compared to only 32% in East Sydney.

The integration of transport and land use planning represents the ‘gold standard’ of strategic plan making in a complex and fast growing City like Sydney. GPT is supportive of the Plan’s intended role to integrate land use and transport planning. However, this role is weakened while fundamental transport decisions remain unresolved.

Several transformational transport infrastructure projects that will impact the GPPGA are currently either under construction or in planning. Although the Plan accommodates known and likely future projects, the confirmation of route and funding decisions for mooted major transport infrastructure is necessary, including:

- Parramatta to Sydney Olympic Park Light Rail Stage 2;
- Sydney Metro West;
- Camellia peninsula enabling bridges;
- Western Sydney Airport rail solution including connections to Parramatta;
- Parramatta River ferry initiatives;
- Implementation of Inner and Outer Ring Roads around the Parramatta CBD; and
- Active Transport Links including but not limited to Parramatta to Rhodes through Olympic Park.

Government commitment to route and station details, funding mechanisms and timing is essential to support planning and investment decisions both now and in the future. Timely decisions and funding commitments must be made for the adequate provision of these most fundamental building blocks of a liveable, productive City. We applaud the Department for identifying future infrastructure requirements and look forward to these projects being defined.

2.3. SYDNEY METRO WEST

As outlined in GPT’s submission to the draft District Plans, GPT believes that connections between the three cities is essential for future growth, and therefore the Sydney Metro West (the Metro) is the crucial piece of transport infrastructure to unlock the potential for the Central and Western cities. As stated above, while GPT applauds the Department for recognising the importance and transformative effect of the Metro, the project remains unfunded and with timing unknown.

There has been much discussion about the location of proposed stops for the line, and the potential for up to twelve stops between Parramatta and Sydney CBD. GPT firmly believe that limiting the number of stops between each CBD would enable the Metro to offer truly world-class, rapid connectivity. Slowing the speed of the Metro by providing more stops, results in the transformative effect of rapid and efficient connectivity between the Central and Eastern Cities being diluted.

GPT is strongly supportive of the Sydney Metro West, however understands that it is not intended be operational before 2027 at the earliest. We need to work together to accelerate this time frame. The exhibited draft Plan indicates that 32% of the total planned residential capacity for Sydney Olympic Park has already either been built or committed to, and that all of Sydney Olympic Park’s residential capacity may be realised prior to 2027.. Existing public transport networks are already struggling to cope with demand, and roads are
congested. This underlines the imperative to bring forward the timing of Metro West, in order to alleviate congestion and maximise the potential of the precinct.

2.4. PARRAMATTA LIGHT RAIL

The Plan identifies that the Parramatta Light Rail (PLR) is integral to enhancing connectivity for precincts throughout the GPPGA. The Department should be applauded for facilitating the funding allocation for Stage 1 of the PLR which will run from Westmead to Carlingford via Parramatta and Camellia. Stage 2 of the PLR running from Camellia to Homebush via Sydney Olympic Park should now be fast-tracked in terms of planning, financing and delivery so that it coincides with the delivery of Stage 1.

As noted above, it is expected that the Sydney Olympic Park could be fully developed prior to the Sydney Metro West being operational. Currently the area is highly constrained by a congested road network that was not designed for the sorts of densities now being proposed in the precinct. Further to this, the rail network runs on a ‘Special Event’ service model which fails to adequately serve the precinct. Bus services to Sydney Olympic Park are also insufficient for demand.

Stage 2 of the PLR would serve as a suitable stop-gap for Sydney Olympic Park in terms of public transport prior to the Metro being operational. It would materially relieve pressure on the transport network servicing Sydney Olympic Park, thus allowing its vision as being a Lifestyle Super Precinct to be fully realised.

Stage 2 of the PLR is also important to the future Camellia Town Centre, particularly if the alignment is situated on the former Sandown line.

2.5. CAMELLIA ENABLING BRIDGES

Camellia is identified as providing 10,000 new homes and 8,850 jobs by 2036, in addition to a town centre and recreation facilities.

As outlined in the Greater Parramatta Interim Land Use and Infrastructure Implementation Plan Background Analysis, it is necessary to develop a transport solution for Camellia so that planning can progress. In addition to public transport discussed above, new transport infrastructure is needed in order to separate heavy and light vehicles, to improve access, and to relieve congestion.

The Background Analysis notes that a total of three new bridges are required over Duck and Parramatta Rivers, intersection upgrades are required on Grand Avenue, and Parramatta Road, a connection is needed from Unwin Street to the M4 ramps at James Ruse Drive, and an upgrade of the Thackeray Street pedestrian link is required.

GPT is keen to understand the process around planning for, funding and delivering these essential enabling projects.

2.6. CORRIDOR PROTECTION

Early identification, protection and acquisition of required land for infrastructure corridor is critical to future proof the viability of infrastructure projects and ensure they can be delivered. When releasing the preferred alignments for future transport corridors, we encourage the concurrent implementation of measures necessary to protect these corridors.

2.7. SOCIAL INFRASTRUCTURE

GPT’s recent submission to the Draft District Plans noted that the pressing need to integrate land use and infrastructure planning is not limited to transport, but to all forms of economic and social infrastructure. This include schools, tertiary institutions, hospitals, recreation and cultural facilities, and essential services, such as fire, police and ambulance stations. While the Plan identifies in general terms where various forms of social infrastructure will be required, it makes no commitments as to when, where and the scale of such provisions.

Timely decisions and funding commitments must be made for the adequate provision of these most fundamental building blocks of a liveable, productive City.

The Draft Infrastructure Schedule (the Schedule), explicitly identifies the roads, intersections and bridges across the GPPGA that need to either be upgraded or constructed. In comparison, the Schedule contains
limited details about social infrastructure, merely identifying the need for new and/or upgraded schools ‘as necessary’, Community health facilities, emergency services, and Social and Affordable Housing.

For viable and liveable communities to be developed across the GPPGA, social infrastructure provision is equally as important as roads, intersections and bridges, and public transport infrastructure. We encourage a whole of Government approach to committing to the timely provision of social infrastructure.
3. GOVERNANCE

3.1. GROWTH INFRASTRUCTURE COMPACTS

GPT supports the establishment of ‘Growth Infrastructure Compacts’ to facilitate cooperation between government, business and the community to realise jobs and housing growth targets. ‘Growth Infrastructure Compacts’ are considered to be a preferential iteration of ‘Collaboration Areas’, as the former acknowledges the importance of including business and the community in the cooperative process.

In particular, GPT supports the GSC and Department’s acknowledgement that collaboration with the private sector will be necessary to achieve desired outcomes, and their acknowledgement of the need to balance development with infrastructure delivery.

Sydney Olympic Park and the broader GPOP (Greater Parramatta and Olympic Park precinct) is a prime example of a precinct that requires powerful collaboration between public and private stakeholders to achieve the desired outcomes. GPT seeks clarity as to how the ‘Growth Infrastructure Compact’ will work on a smaller scale i.e. Sydney Olympic Park, and wishes to understand how the GSC envisages these relationships will function in practice. In addition, the mechanism of agreeing to and funding key outcomes requires clarification.

Finally, consideration should be given to statutory reforms which will empower the GSC to implement meaningful change through the Growth Infrastructure Compacts process.

3.2. FUNDING & VALUE CAPTURE

The Plan references the need for value capture mechanisms to fund and deliver infrastructure across the GPPGA, although no detail is provided of the Government’s intent in this regard.

GPT recognises the strong drive to reduce the cost to government when investing in infrastructure. Current thinking within government appears to understand value capture solely as a short-term capital recovery strategy, derived from collecting funds from land owners in the immediate vicinity of a piece of infrastructure.

GPT is of the view that this current understanding of value capture, while it is the prevailing governmental perspective on value capture (see Federal ‘Smart Cities Plan’) is short-sighted and impacts on the successful delivery of quality outcomes. In addition to impacting project viability, this approach raises the cost of development on prime sites, thus generating an unintended outcome of making marginal sites more attractive for development at the expense of better located sites.

GPT encourages the NSW Government to review its thinking around value capture, and view it as a long-term idea that focuses on supporting transport and infrastructure outcomes at a metropolitan level rather than solely through a land uplift framework.

Reducing congestion - through provision of new public transport infrastructure - has been demonstrated to have significant, metro-wide direct and indirect economic benefits. Further, reduced congestion and rapid transit connections will increase Sydney’s global appeal and competitiveness.

By thinking about value capture or return on investment (ROI) from a long-term perspective, ROI can instead be achieved by government through increased future tax revenue collected over the entire Sydney metropolitan catchment. As the city continues its path to become what the draft Plans says will be “the most liveable city in the world”; it will continue to attract new investment in jobs and housing. Thus, total tax revenue will increase. This alternative framework for conceptualising ROI for infrastructure spending, would allow the best possible transport outcomes to be delivered to Greater Sydney rather than those that have the largest immediate/short term opportunity for value capture.

GPT encourages the NSW Government to adopt an approach to value capture that balances the need for short term capital recovery, with long term alternative capital recovery mechanisms.

3.3. SPECIAL INFRASTRUCTURE CONTRIBUTIONS

Value capture seeks to recover some of the value that public infrastructure generates for private landowners. Options to expand value capture beyond the currently limited application of Special Infrastructure Contribution (SIC) levies, and ad-hoc Local and State VPAs, have been mooted over recent years.
GPT understands that there are currently 12 SICs in preparation that will govern various areas of Metropolitan Sydney. Private sector involvement in the preparation of SIC plans would ensure that the commercial impacts of these plans has been realised in their inception, which should serve to make them more effective. GPT seeks to be involved in the preparation of these SIC Plans.

GPT also seeks to understand how these levies will affect the development potential of GPT’s assets, with a specific focus on Sydney Olympic Park and Camellia.

GPT urges the Government to ensure that any new SIC Levy is properly coordinated with other levies and taxes, and the delivery of the infrastructure it funds is required to be delivered in a timely manner.

3.4. COST OF DEVELOPMENT

There are many different forms of fees and levies – both current and mooted – payable prior to construction certificate.

1. DA fee
2. Strategic planning fee (paid with DA)
3. Infrastructure upgrade costs and connection charges
4. Long Service Levy
5. S94 contributions
6. VPA with various inclusions at Council’s discretion - current
7. Affordable Housing Levy - mooted
8. SIC Levy - mooted
9. City of Parramatta value capture model to take 50% of uplift value - mooted

GPT has always recognised the need to give back to the community. Further, the deficit in the provision of infrastructure in the GPOP region when compared to other areas of Sydney is recognised. However, while each of the above fees and levies have individual merit, cumulatively they have a marked impact on development feasibility and affordability of end product. Remediation costs also add significantly to development costs in many parts of Greater Parramatta.

Landowners will only be motivated to change a land change if there is an economic incentive to do so. If the economic incentive is eroded through onerous levies then development is not financially feasible; as such the desired revitalisation (and payment of levies and charges) is simply not realised.

GPT does not contend that the community is not entitled to a fair share of realised value, however the percentage of value which should be redistributed, and the point in the development process at which this happens, is of significance.

The current model requires charges to be paid prior to issuing of a construction certificate, which in turn drives up the cost of financing development. The provision of infrastructure or the rezoning of land generates an increase in land value, and the development process generates development profit. However, there needs to be a better understanding, across all levels of Government, about what point in the project life cycle increased value is created, and the risk required to actualise that increase in value.

In terms of timing of payments, GPT submits that an applicant should not be required to give value until value is realised. Bank guarantees or funds held in Trust until the infrastructure is delivered, could enhance project feasibility. While some would argue that this would inhibit Government’s ability to provide essential new infrastructure, this position fails to acknowledge Government’s ability to access cheaper financing, and indeed deliver new infrastructure through monies acquired through established taxation models. GPT’s alternative payment model would incentivise Governments to efficiently deliver new infrastructure in a timely and cost effective manner.

3.5. REZONING AND UPLIFT PATHWAYS

The GPPGA framework leaves open a range of potential pathways to facilitate rezoning and uplift of areas, including Precinct Planning under the Growth Centres SEPP, Council-led Planning Proposals proponent-led Planning Proposals.

This flexible approach is supported by GPT, but it would be useful to see firm and definitive frameworks in place no matter what pathway is taken. There should be certainty and consistency around timing and funding of State and Local infrastructure works, around caps on development contributions for State, Regional and Local infrastructure, limits to direct infrastructure works required to be constructed by
developers under VPAs, value capture models, and affordable housing levies. Without this certainty, there is a high risk that development will stall.

3.6. DEVELOPMENT APPROVALS PATHWAYS

In recognition of the importance of the GPPGA to the realisation of Greater Sydney’s wider productivity and liveability goals, GPT suggests that consideration be given to development in the GPPGA over a certain value being determined through the State Significant Development Application pathway. This would ensure that the Minister is the approval authority for large projects within this significant precinct.
4. **FUTURE PLANNING**

By future planning, we refer to the need to plan for future likely disruptions and changes to the built environment, such as:

- Autonomous vehicles;
- Autonomous trucks; and
- Dark warehouses.

4.1. **AUTONOMOUS VEHICLES**

Sydney Olympic Park is already the testing ground for a driverless shuttle bus, which will run as part of a two-year trial of autonomous vehicles launched by the State Government. Given the high dependency on car usage in the region, and the already identified transport constraints relating to the road network, GPT sees the wider GPPGA as being the perfect location for a precinct wide test case for autonomous vehicles (AV). The opportunity that is presented by AV to completely reimagine the area cannot be understated, and nor should it be ignored.

While the benefits that AV represent are huge, it is important that a considered regulatory environment is imposed. Private AV should not be encouraged, rather network based AV should be favoured to ensure that the technology does not result in an increase in use of roads. Network based systems have the potential to reduce the amount of land required for car parking, and as a result could facilitate more vibrant centres.

4.2. **AUTONOMOUS TRUCKS & DARK WAREHOUSES**

As technology revolutionises every aspect of our lives, the way in which logistics/industrial lands operate will necessarily evolve and change as well.

We encourage the Department to provide thought to the impact of future technologies on logistics and the demand for industrial lands, specifically:

- Internet shopping;
- Dark warehouses; and
- Driverless trucks.

If we fail as a city to consider, plan for, and embrace change then we risk stagnating our economy, and placing unnecessary hurdles in front of industry, which will impact commercial viability and subsequently the City’s (and Nation’s) ongoing economic growth.
5. SYDNEY OLYMPIC PARK

The Plan does not delve deeply into how the strategic direction of Sydney Olympic Park will be realised, instead deferring to the draft Master Plan 2030. To look at Sydney Olympic Park in isolation represents a missed opportunity to understand a complex and interconnected precinct whose opportunities and constraints are impacted by the precincts surrounding it, and indeed the issues facing wider Metropolitan Sydney.

5.1. SYDNEY OLYMPIC PARK ROLE AND FUNCTION

Sydney Olympic Park was identified in the draft West Central District Plan as being a ‘Lifestyle Super Precinct.’ This title has been reinforced in the Plan. GPT recognises and exalts Sydney Olympic Park’s historic and existing role as Sydney’s world-class sporting and event venue, however also acknowledges the need for the precinct to evolve into a sustainable mixed use precinct of high accessibility and amenity.

Both the draft District Plan, the GPOP Vision document, and now the Plan are vague on how this transformation of Sydney Olympic Park into an inner-city style living precinct will be achieved. To facilitate this transition Sydney Olympic Park needs anchors which serve numerous purposes, predominantly serving to broaden the appeal of the precinct and activate it outside of office hours and event mode. This activation is unlikely to happen without Government-led initiatives and support which will be crucial to the successful introduction and integration of uses such as tertiary education, including student accommodation, and arts and cultural destinations.

The transformation and urban renewal of Kings Cross, London is a prime example of how a tertiary education institution can serve as a lynchpin tenant in a development. Attracting the University of the Arts London’s Central St Martins College served as a catalyst for the Kings Cross project which consequently saw Google, Universal Music and Havas Media commit to relocating to the project.

In relation to the arts and culture, per the Building Western Sydney’s Cultural Arts Economy report, prepared by Deloitte for the Sydney Business Chamber and Liverpool, Parramatta and Penrith Councils, there is a striking equity imbalance relating to access to cultural facilities in Western Sydney. Nearly one-third of NSW’s population live in western Sydney, but the region receives just 5.5% of the state government’s arts budget.

For Sydney Olympic Park to transform into a vibrant mixed use precinct, there needs to be clear strategy articulated in the District Plan, supported by comprehensive plans such as attracting cultural lynchpin tenancies that will facilitate the realisation of the aspirations and vision for Sydney Olympic Park. The Government must work with key stakeholders to steer the transformation of Sydney Olympic Park from a precinct that is activated only in event mode, to a true 18/7 mixed use economy.

5.2. JOB CREATION

Sydney Olympic Park is identified in the plan as having a job creation target of 34,000 jobs by 2036. In order to achieve this, Sydney Olympic Park would materially benefit from the relocation of a tertiary education institution within the precinct, both to stimulate jobs growth and to serve as an economic activator. GPT tabled this idea in its draft District Plans submission, and reiterate the transformative nature that a cultural lynchpin tenancy would have in realising Sydney Olympic Park as a vibrant mixed use precinct, in line with strategic intent for the precinct.

5.3. EDUCATION INFRASTRUCTURE

GPT is optimistic that the need for additional social infrastructure being recognised for Sydney Olympic Park within the Plan will result in a degree of traction around the provision of resources. We encourage the Department to release specifics around the level of provision required, specifically how many schools will be required. GPT seeks clarity around the capacity of the existing schools that cover the catchment to absorb demand, and when new infrastructure will be brought online to meet demand and specifically where they will be located. Like transport infrastructure we urge the Department to forward plan the location of these schools and where appropriate purchase the land or place covenants on the titles to preserve the land to meet future community needs.

It is essential for primary and secondary schools to be established, in addition to a significant tertiary education facility within Sydney Olympic Park to support residential growth in the area, and reflect its role in the region.
5.4. TIMING IS CRITICAL

It is critical for the future development potential and viability of Sydney Olympic Park that the above issues are tackled as a matter of priority. The current lack of amenity and transport accessibility within Sydney Olympic Park has already resulted in key tenants choosing to relocate to other areas of the city, notably Commonwealth Bank. This makes it challenging to retain and grow employment and satisfy its residential targets.
6. **CAMELLIA**

6.1. **INDUSTRIAL DEMAND REMAINS HIGH**

The demand for industrial and logistics facilities in Camellia is currently high. The logistics sector is a key element in the industrial land supply equation. It is increasingly a dominant land use within industrial lands as our economy continues to move away from manufacturing toward a services driven economy.

Landowners need an economic incentive to change a land use. If this economic incentive is eroded through onerous levies, then development becomes problematic and not financially feasible. In the case of Camellia, as previously noted the market demand for infrastructure/logistics facilities within the locality is currently robust. To support landowners in changing land uses in this location, the Government needs to be cognisant of not eroding the economic incentive to do so.

6.2. **SUPPORT FOR TRANSFORMATION**

The transformation of the Camellia-Carlingford corridor into a ‘Next Generation Living’ Precinct is a compelling concept which is supported by GPT. The GPOP Vision document indicates that as a ‘Next Generation Living’ Precinct, the area “will comprise a mix of medium to high-density housing types with nearby education, research, retail, recreation and entertainment facilities providing all the conveniences of ‘inner-city’ living”.

The Plan does not include a meaningful guide to how the transformation of the area into ‘a 21st-Century living, learning and leisure district’ can be realised. Nor does it give comfort that the timely delivery of education, research, retail, recreation and entertainment facilities can be assured.

Further, to fully support the revitalisation and transformation of Camellia from an industrial precinct to a ‘Next Generation Living’ Precinct, development assessment should be managed by the Department as opposed to Council. This will ensure that the revitalisation of the precinct is streamlined, and that the wider strategic goals are not sacrificed in favour of local political outcomes.

GPT is supportive of the Department’s goal to create smart, vibrant and inclusive communities, and seek clarity on the above issues to work together with government as partners in success towards this goal.

6.3. **LAND USE CONFLICTS**

As new land is released, and urban industrial lands are progressively rezoned, careful consideration needs to be given to minimising land use conflict. Incompatible land uses should be buffered, and conflicts between truck and passenger car movement carefully avoided. This is of particular importance within Camellia, and GPT is supportive of the Department’s recognition of this.

GPT is cautiously encouraging of the Department’s stance that further detailed planning of Camellia should not be progressed until such a time as the transport conflicts and issues have been resolved. However, as a key land holder within Camellia, GPT seeks clarity and a firm commitment from Government around the timeframe for transport planning resolutions for Camellia.

While GPT supports a degree of flexibility in zoning provisions to facilitate and support innovation and technological change, it is equally important to maintain traditional land use separation theory that buffers residential uses from significant industrial, freight and logistics precincts.
7. **PARRAMATTA CBD**

GPT shares the Department’s view of the vital role that Parramatta will play as the hub of the ‘Central City’. In fact, GPT has recently acquired a key landholding in the Parramatta CBD (32 Smith Street), on which a 28,000sqm (GFA) A-Grade office building is to be developed.

GPT also supports the Plan’s recognition of the key role that the *Parramatta CBD Planning Strategy* will play in providing for an expanded and more intense commercial core, while also protecting commercial floor space from strong pressure for residential redevelopment.

For greater certainty in investment decisions in Parramatta, it is critical that the State Government work with Parramatta Council to finalise the *CBD Planning Strategy* as a matter of urgency.

In addition to this, the State Government must commit to key decisions around light rail, metro rail, and road upgrades. The Government must also work with the private sector to discuss and agree infrastructure funding mechanisms, and lock these in so that development investment decisions can be made.

To support these key decisions around transport infrastructure upgrades, long term thinking needs to occur around the corridor protection for Metro linking the Central and Eastern Cities, as well as linking the Central City to the future Western City at Western Sydney Airport. This Metro line will serve as a central spine for the wider city upon which Parramatta’s position as the heart of Sydney will be dependant.

GPT is supportive of the administrative ‘hub and spoke’ model as identified in the Plan, however we seek to emphasise that a hub is only truly developed to its full potential when its spokes are effective at accessing the central hub, and support thriving economic hubs in their own right. This is especially relevant to Sydney Olympic Park and Camellia.
8. CONCLUSION

Overall GPT is highly supportive of the Department’s efforts to advance the Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan. GPT is further supportive of efforts to integrate land use and transport planning to holistically plan the GPPGA.

GPT’s comments on the Plan and related matters are set out in detail in this submission.

We would welcome the opportunity to discuss any of the matters outlined.
This report is dated 6 September 2017 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd’s (Urbis) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of The GPT Group (Instructing Party) for the purpose of Submission to Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan (Purpose) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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