

28 March 2018

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Yolanda Gil
Director, Greater Parramatta Urban Renewal
Department of Planning & Environment
10 Valentine Avenue
PARRAMATTA NSW 2150

Att: Anthony Pizzolato, Precinct Manager Greater Parramatta Urban Renewal

Dear Yolanda

RE: Submission – Public Exhibition of the Draft Camellia Town Centre Master Plan

This submission has been prepared by Ethos Urban on behalf of landowners Tuck Hing Ho Pty Ltd (Tuck Hing Ho), in relation to land at 175 James Ruse Drive, Camellia (the Site). It relates specifically to the proposed *draft Camellia Town Centre Master Plan* (Draft Master Plan) and supporting studies, prepared by the Department of Planning and Environment (DPE).

We would like to acknowledge the considerable time and effort that has been invested in the preparation of the Draft Master Plan and Tuck Hing Ho commends the progression of a plan that will support housing and employment prospects in the strategically located Camellia. It provides a solid foundation from which to plan for growth and urban renewal within the Greater Parramatta to Olympic Peninsula (GPOP).

While the *Draft Master Plan* establishes a broad spatial framework for the future planning of the area, we believe there are four (4) key issues which require further consideration and resolution prior to the finalisation of the Master Plan.

A summary of these key issues and recommended actions are provided below.

Issue	Recommended Action
1. Inability to achieve the proposed density (FSR of 4.5:1) on the site due to a misalignment between land ownership parcels and proposed 'urban blocks'.	<i>Revise the proposed built form and public domain elements to ensure that future height and floor space controls are commensurate to the site's existing allotment boundary, and its strategic location and role within the Town Centre.</i>
2. Implication on the delivery of dwellings and jobs across the Camellia Town Centre should the active Planning Proposal for 181 James Ruse Drive be gazetted.	<i>Ensure an equitable distribution of housing and employment opportunities is applied across the precinct.</i>
3. Contrary to the vision and objectives for the precinct, there is a limited scope of land use mixture envisaged for the Camellia Town Centre.	<i>Apply a flexible land use zone to the site, such as the B4 Mixed Use Zone, to ensure it can accommodate and meet future demand for a wide range of uses. This will ensure that the site can contribute to the vitality and mixed-use outcomes for the town centre as envisaged by the Draft Master Plan.</i>
4. Mismatch between certain design guidelines, building typologies and proposed urban design outcomes.	<i>Review the application of key urban design principles in reference to desired built form outcomes and ensure consistency across the precinct.</i>

This letter is accompanied by an Urban Design Report prepared by Ethos Urban (refer to **Attachment A**).

1.0 The site

The site is located on 175 James Ruse Drive, Rosehill (known as Lot 1 DP733217) and is within the Parramatta local government area. The site is an irregular shape and has frontages to James Ruse Drive and Grand Avenue North (refer to **Figure 1**). A key feature of the site is its proximity to the Camellia Railway Station, future light rail stop and Parramatta CBD. The site also has a large site area of approximately 17,000sqm located within the proposed core of the Camellia Town Centre Master Plan (refer to **Figure 2**), making it an important catalyst site for the future revitalisation of the Camellia Town Centre.



Figure 1 Aerial of the Site

Source: Ethos Urban



Figure 2 Location of the Site within proposed Camellia Town Centre Master Plan

Source: NSW Department of Planning and Environment

2.0 Key issues of the Draft Camellia Town Centre Master Plan

Ethos Urban has undertaken an urban design analysis of the Site (refer to **Attachment A**) which explored a number of development scenarios to understand and resolve site-specific built form implications of the *Draft Master Plan* in its current form.

Arising from this investigation is a recommended revised scheme that will lead to an improved design outcome for the Site, while remaining aligned to the site-specific urban design objectives set out by the Urban Design Study.

The key issues of the *Draft Master Plan* that have ascended from the investigation are described in further detail below.

2.1 Inability to achieve the proposed density on the site due to a misalignment between land ownership parcels and proposed ‘urban blocks’

Option 1: Development in accordance with Draft Camellia Town Centre Master Plan.

The *Draft Master Plan* proposes a new urban block configuration, which establishes the spatial framework for the town centre. Of primary concern is the misalignment of the proposed urban blocks with the existing land ownership boundaries of the Site and its proposed floor space ratio (FSR), as identified within DPE’s *Draft Camellia Town Centre Master Plan Planning Report*.

In its current form, the proposed urban blocks and building envelopes encroach into the adjoining site (Lot 2 DP 430623), also known as Sydney Water Pumping Station site, which is owned and managed by Sydney Water. This suggests that future development of the Site would rely on the adjoining land under State government ownership to accommodate the proposed density and built form envisaged by the *Draft Master Plan*.

The proposed FSR of 4.5:1 has been applied to the eastern portion of the Site, however does not extend to the full envelope of the urban blocks, with no FSR control applied to this adjoining Sydney Water Pumping Station (refer to **Figure 3**).

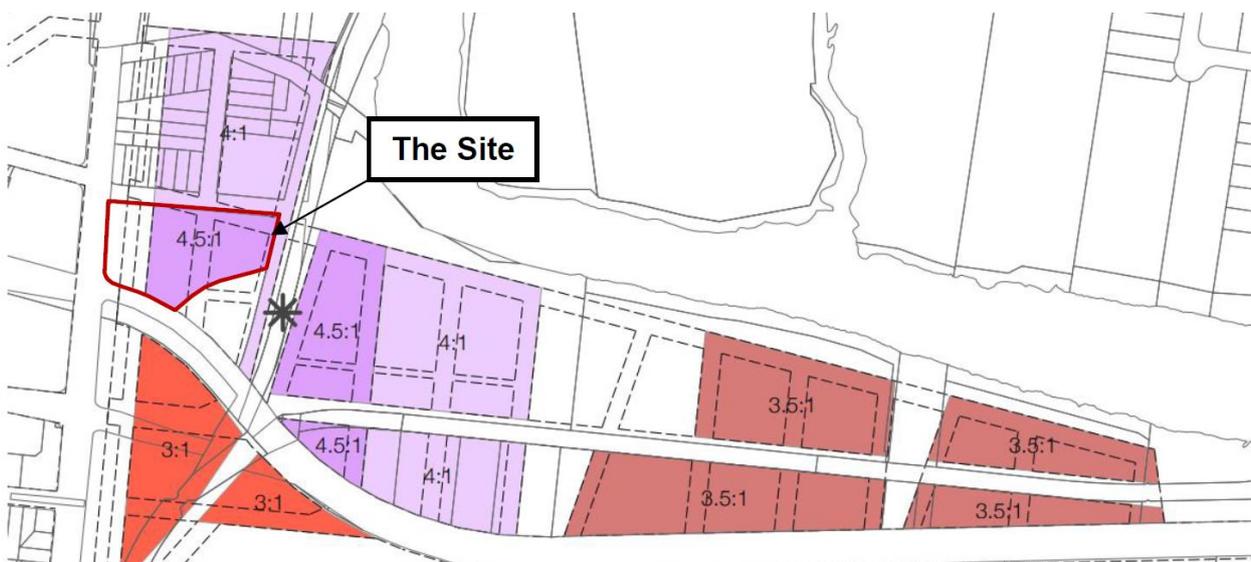


Figure 3 Proposed floor space ratio

Source: *Draft Camellia Town Centre Master Plan Planning Report*, NSW Department of Planning and Environment

The misalignment of the proposed urban blocks and building envelopes with the site boundary and proposed FSR significantly discounts the maximum gross floor area (GFA) that could be generated by the proposed FSR of 4.5:1 on the Site. The loss of potential GFA is lost to accommodate proposed massing on the adjoining parcel (refer to **Figure 4**).

Under this scenario, it was found that approximately 3,259sqm of GFA falls outside the Site's boundary. This resulted in a maximum GFA of 49,419sqm that could be achieved on the site, translating to an equivalent FSR of 3.99:1.

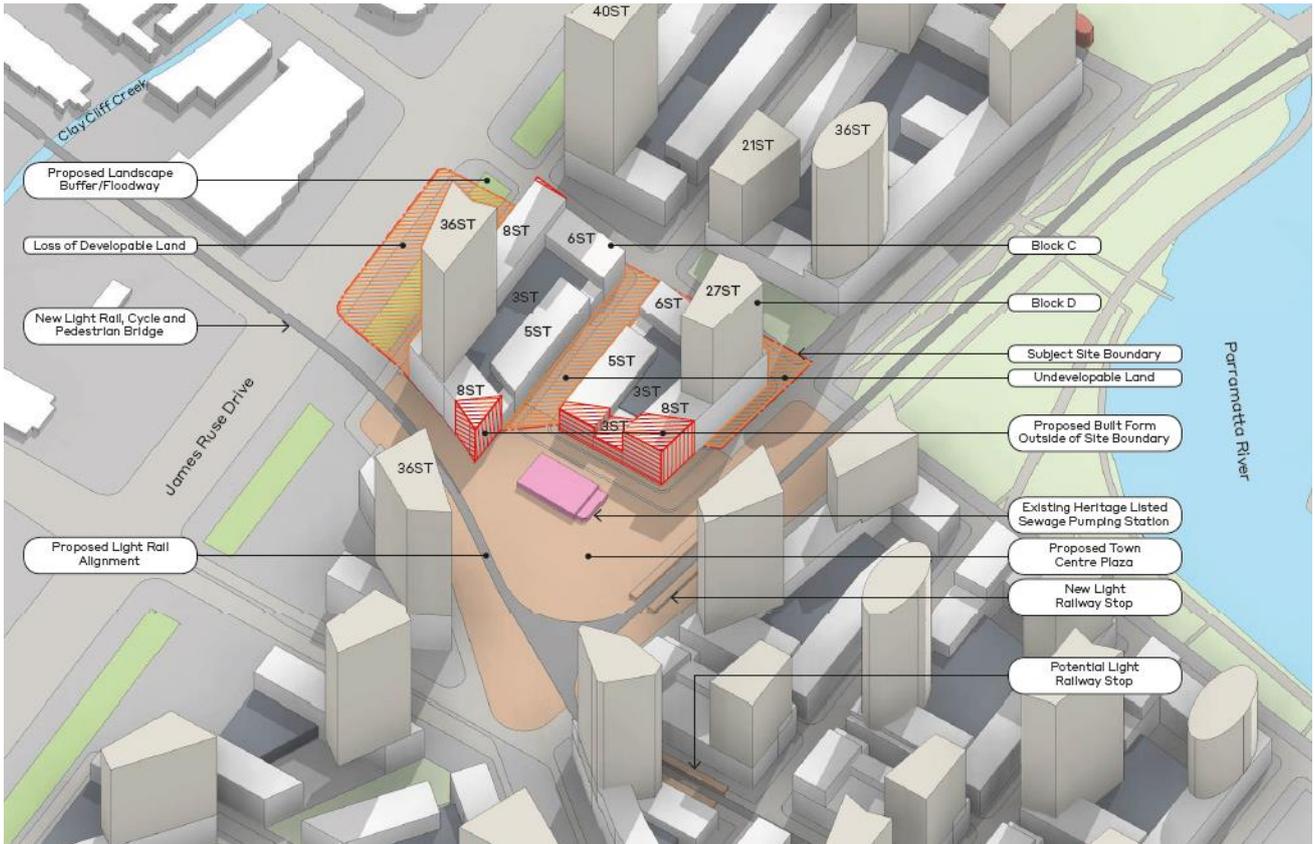


Figure 4 Built form outcome based on proposed controls in Draft Master Plan

Source: Ethos Urban

Option 2: Development within site boundary and in accordance with Draft Camellia Town Centre Master Plan

In response to the loss of potential GFA, the urban design analysis investigated the achievable gross floor area (GFA) based on a scenario which contained building mass entirely within the Site (as shown in **Figure 5**). This would allow for development of the Site, independently from the adjoining Sydney Water site.

Building footprints were adjusted to fit within the current land ownership boundary, with proposed envelopes and heights retained from the *Draft Master Plan*. This adjustment maintained building separation and depth and resulted in a maximum GFA of 49,719sqm, translating to an equivalent FSR of 4.02:1.

This scenario presents the most realistic option for future development of the Site based on the proposed planning controls of the *Draft Master Plan*. However, it does not represent the best urban design or planning outcome in that it does not allow for a coordinated design or planning response to the adjacent Sydney Water site, which is identified in the *Draft Master Plan* as a key public plaza and central community space within the Camellia Town Centre, and it does not maximise density or height closest to the future light rail and Town Centre.

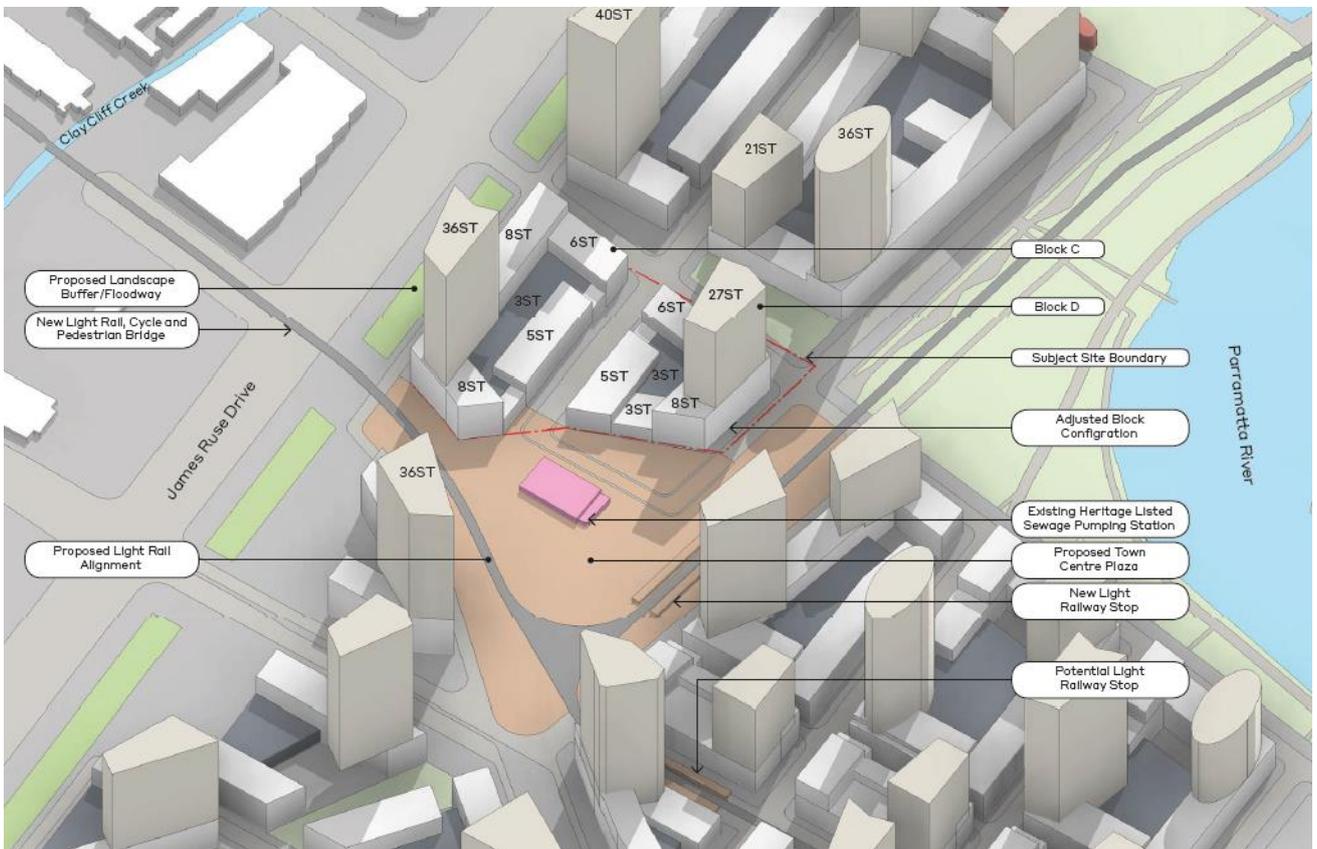


Figure 5 Built form outcome of development within site boundary based on proposed controls in Draft Master Plan

Source: Ethos Urban

Option 3: Development within the site boundary and additional height to meet 4.5:1 FSR

Further analysis was undertaken to establish a built form response to accommodate a GFA equivalent to the proposed 4.5:1 FSR (refer to **Figure 6**). The following changes were proposed:

- reconfigure building envelopes with existing southern boundary alignment;
- increase number of storeys for proposed tower on Block C to 40 storeys;
- increase number of storeys for proposed tower on Block D to 29 storeys; and
- provide an additional storey to the podium setting addressing River Road East and First Street.

The Site is located adjacent to the Camellia Train Station and future light rail stop and is destined to become an important catalyst for the revitalisation and development of the future town centre. This additional required height remains in keeping with the vision for the precinct as well as Camellia’s strategic positioning within the hierarchy of activity centres across Greater Sydney.

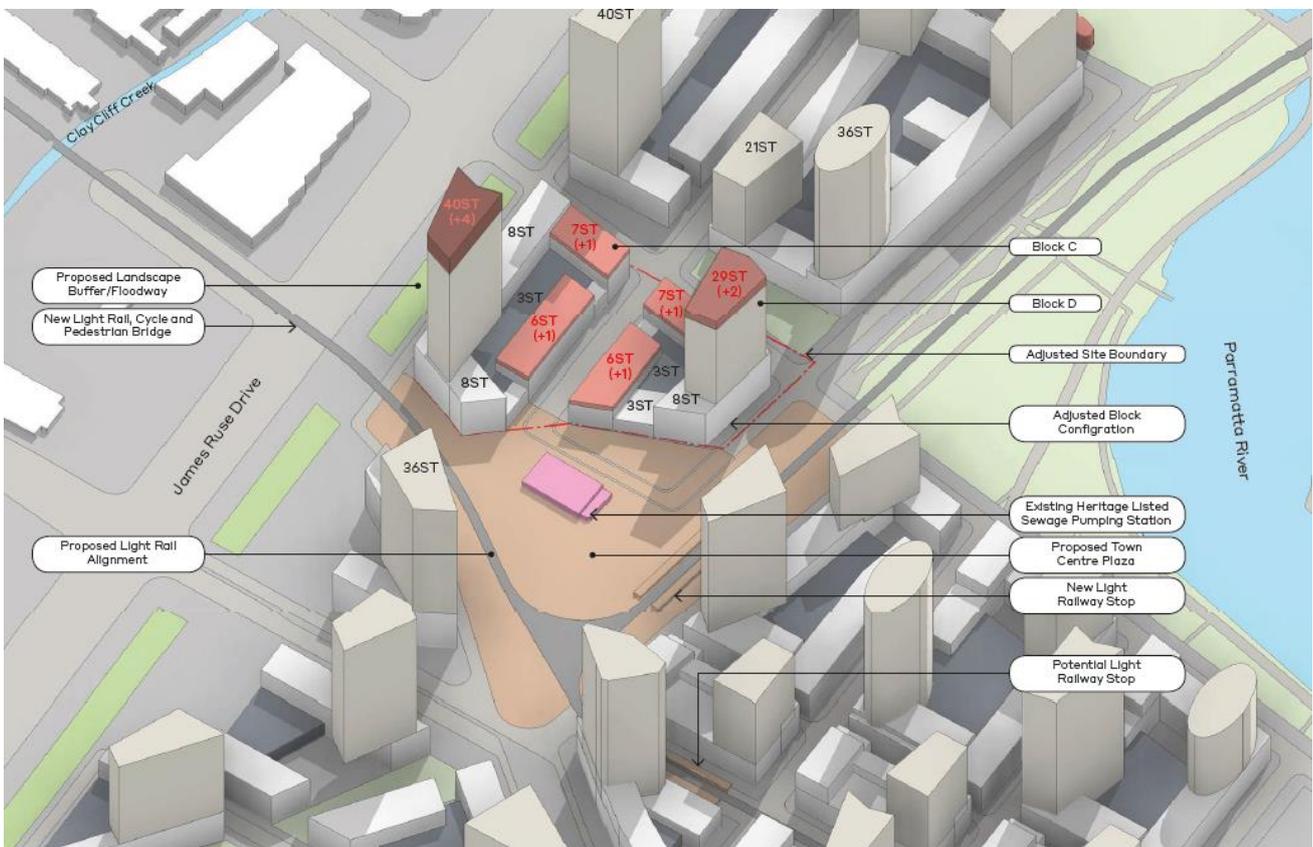


Figure 6 Built form outcome based on increased heights within Draft Master Plan

Source: Ethos Urban

Recommended scheme: Realignment to River Road East and additional height to meet 4.5:1 FSR

The *Draft Master Plan* establishes a new street network within the Camellia Town Centre based on an axis of three primary streets running east - west connected by a series of local roads running north – south towards Paramatta River. The proposed street network results in a significant loss of developable land within the Site due to:

- The widening of James Ruse Drive and associated public domain areas;
- The proposed alignment of the River Road West extension; and,
- New local roads running north-south across the site.

It appears that the proposed extension of River Road West is informed by the existing alignment to the west of James Ruse Drive. This alignment, while understandable, disregards the current/existing road and ownership boundaries, which run parallel along the northern boundary of the site. This has substantial consequences in reducing the site’s urban block and development potential.

One of the key design principles for future road alignment is identified within the *Draft Master Plan* as promoting a ‘cohesive and connective street network’ that allows for long range views to the Paramatta River and the town centre. We believe that other interventions such as landscaping, architecture and public domain enhancements can retain these visual cues and promote a sense of legibility and walkability.

We have modelled an alternative scheme which realigns the proposed extension to River Road West to reflect the existing parallel road alignment (see **Figure 7**). In addition to the change in road alignment, the following changes have been incorporated to accommodate sufficient GFA to achieve the proposed 4.5:1 FSR.

- reconfiguring urban blocks with existing southern boundary alignment;
- increase number of storeys for proposed tower on Block C to 39 storeys; and
- provide an additional storey to the podium setting addressing River Road East and First Street.

Subject to the advice of a traffic assessment, further consideration of the road alignment between James Ruse Drive and Tramway Terrace is required to ensure built form outcomes are cognisant of current land ownership boundaries, existing street alignments and realistic development scenarios. Further



Figure 7 Recommended built form outcome to achieve 4.5:1 FSR

Source: Ethos Urban

2.2 Implications of planning proposal for 181 James Ruse Drive

The site known as 181 James Ruse Drive is located to the immediate north of the Site and is subject to an active Planning Proposal to rezone 181 James Ruse Drive from B5 Business Development, to part B4 Mixed Use and part RE1 Public Recreation. The proposal was given Gateway Determination by DP&E in September 2015 and was recently endorsed by Parramatta City Council to proceed to DP&E for finalisation and gazettal. The proposal includes a maximum FSR of 5.3:1 which could deliver approximately 3,100 dwellings & 745 jobs within the Camellia Town Centre.

Having regard to the maximum capacity of the Town Centre to support 10,000 dwellings, which was formulated on infrastructure, traffic and environmental constraints, it is recommended that the DPE ensure an equitable approach in the distribution of housing and employment across the Town Centre and to sites beyond its boundaries.

2.3 Limited scope of land use mixture envisaged for the Camellia Town Centre.

The *Draft Master Plan* promotes Camellia Town Centre as a residential, commercial and retail precinct that will support the primacy of the Paramatta CBD as the principal centre within the Central City District. Good planning practice suggest that land use mix is a vital component of creating vibrant and thriving communities and in order to achieve a truly mixed-use town centre we believe that a broader scope of land uses should be considered.

Given the precinct's proximity to the Rosehill Gardens, Western Sydney University Rydalmere Campus and the Sydney Speedway track, we believe there are a range of other non-residential land uses which would be worth consideration within the Camellia Town Centre. These include:

- Tourist and visitor accommodation;
- Serviced apartments; and
- Student housing and other forms of short stay accommodation.

It is understood that the DPE will formulate land use zoning options as part of the rezoning package for the Town Centre.

It is recommended that an open land use zone (such as B4 Mixed Use) is proposed for the Town Centre, which permits a broad range of land uses with consent and as such has a high level of flexibility. This means that should demand-driven uses evolve and necessitate different uses, an open zone has a high likelihood of enabling its approval, subject to any relevant standard being satisfied.

In addition to defining an appropriate land use zones, employment generation will require careful consideration to support the envisioned 5,000 jobs in the Town Centre. We believe that this is an ambitious target, with further analysis (such as an economic development strategy) being necessary to understand existing and future employment generators and how Camellia Town Centre will sit within the context of Greater Parramatta and broader Sydney and the other competing/complementary centres.

An economic development strategy will also need to speak to the Draft Master Plan, in terms of the key characteristics and configuration of built form, land uses, place, amenity and services to attract these businesses. This will better place the development of proposed zoning and development standards that provide capacity and demand to support 5,000 jobs, in addition to the 10,000 dwellings earmarked for Camellia.

2.4 Mismatch between certain design guidelines, building typologies and proposed urban design outcomes.

The supporting *draft Urban Design and Master Plan Report* prepared by Hill Thallis, sets out key design principles to guide the future development of the Camellia Town Centre. Upon review of the proposed urban design framework, we believe further resolution of a number of design principles are required to ensure community-focused outcomes for the precinct. These are summarised below:

- The interrelationship between building typology and setback controls needs further consideration given the potential impacts in accommodating commercial land uses within the proposed '2 storey non-residential crust'. The 'sleeved car parking' configuration in conjunction with the shallow podium depth is not conducive to a 'retail anchor' as envisaged by the *draft Urban Design Report*. The additional ground floor setback controls and flood mitigation responses may further restrict the ability for certain commercial land uses and impact upon market delivery.
- The *Draft Master Plan* does not provide enough detail on how future building height controls will be applied to the Site. At present, proposed building heights are projected onto a built form massing which does not correlate with the current landownership boundaries.
- There is a discrepancy between plans that show the extent of the local road networking running north - south through the subject site, for example Figures 2.3 and 3.3.4 of the Report. The location of the east-west future road across Sydney Water's land also requires further consideration, in particular the interface of buildings, roads, pedestrians and public open space. The final alignment of these roads will have significant impacts on the built form outcomes within the site and should be further considered in future iterations of the plan.
- There is an emphasis within the Draft Master Plan to 'concentrate densities around the proposed Camellia Light Rail Stop and future retail core' yet the majority of the building massing and density is proposed within the 'Northern Point' Precinct.
- Long, elongated urban blocks sleeved by 'crusted podiums' will limit pedestrian through linkages and mid-block permeability. Internalised car parking structures should be carefully managed to ensure that future commercial and residential tenancies are not adversely impacted by shallow floorplates, single-aspect frontages and poor permeability, including the need to go up and over the structures to connect east-west across the site.

Conclusion

Thank you for the opportunity to provide a submission of the *Draft Master Plan*. We believe that a truly integrated and coordinated planning, design and land use approach is required to ensure that the Department’s vision for the Camellia Town Centre can be realised.

Our site is well positioned to accommodate increased residential densities, commercial activity and a mixture of supporting uses due to its adjacency to the Camellia Train Station, future Parramatta Light Rail and future civic hub. It will also be an important catalyst site in stimulating future development within the precinct.

To reiterate the key issues and recommended actions of the submission.

Issue

- 1. Inability to achieve the proposed density (FSR of 4.5:1) on the site due to a misalignment between land ownership parcels and proposed ‘urban blocks’.**
- 2. Implication on the delivery of dwellings and jobs across the Camellia Town Centre should the active Planning Proposal for 181 James Ruse Drive be gazetted.**
- 3. Contrary to the vision and objectives for the precinct, there is a limited scope of land use mixture envisaged for the Camellia Town Centre.**
- 4. Mismatch between certain design guidelines, building typologies and proposed urban design outcomes.**

Recommended Action

- Revise the proposed built form and public domain elements to ensure that future height and floor space controls are commensurate to the site’s existing allotment boundary, and its strategic location and role within the Town Centre.*
- Ensure an equitable distribution of housing and employment opportunities is applied across the precinct.*
- Apply a flexible land use zone to the site, such as the B4 Mixed Use Zone, to ensure it can accommodate and meet future demand for a wide range of uses. This will ensure that the site can contribute to the vitality and mixed-use outcomes for the town centre as envisaged by the Draft Master Plan.*
- Review the application of key urban design principles in reference to desired built form outcomes and ensure consistency across the precinct.*

We would welcome any further opportunities to work collaboratively with the DPE in contributing to the finalisation of the Master Plan and/or rezoning package for Camellia Town Centre.

Yours sincerely,



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