

29 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 Commonwealth Superannuation Corporation (CSC) in relation to land at 14A River Road West, Parramatta (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 time and effort that has been invested in the preparation of the *Draft Master Plan* and CSC welcomes the progression of a plan that will support housing and employment prospects in the broader Camellia precinct.

While the *Draft Master Plan* establishes a broad spatial framework for the future planning of the area, we believe there are several 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. Structure of proposed road network extending across James Ruse Drive	<i>Revise the draft Master Plan to remove the proposed road along the River Foreshore on the Site to be cognisant with adjoining development and present a more realistic street pattern.</i>
2. Future Density and Traffic and Transport	<i>Broader consideration and review of the impact of the proposed density envisaged by the Draft Master Plan upon Precinct 08 – Parramatta (River Road West & Alfred Street) to ensure that there is equitable apportionment of density across similar urban renewal precincts within the broader Rosehill/Camellia precinct.</i>
3. Implications of Planning Proposal for 181 James Ruse Drive	<i>DPE ensure an equitable approach in the distribution of housing and employment across the Camellia Town Centre and to similar sites beyond its boundaries.</i>
4. Proximity of the Site to the Camellia Town Centre	<i>Consideration of a more strategic urban renewal precinct and opportunity along the southern banks of the Parramatta River between the Parramatta City Centre and the Camellia peninsula.</i>

1.0 The site

The Site is located at 14A River Road West, Parramatta (known as Lot 1001 DP 841274) and is within the Parramatta local government area. The 2.2ha site is an irregular shape and has frontages to James Ruse Drive, River Road West and the Parramatta River (refer to **Figure 1**). The large land holding is currently occupied by a number of service businesses and light industrial land uses. The Site is immediately adjacent to the boundary of the Camellia Town Centre and has similar characteristics and relevance when considering the future revitalisation of the Greater Parramatta to Olympic Park Peninsula and the Parramatta River foreshore.

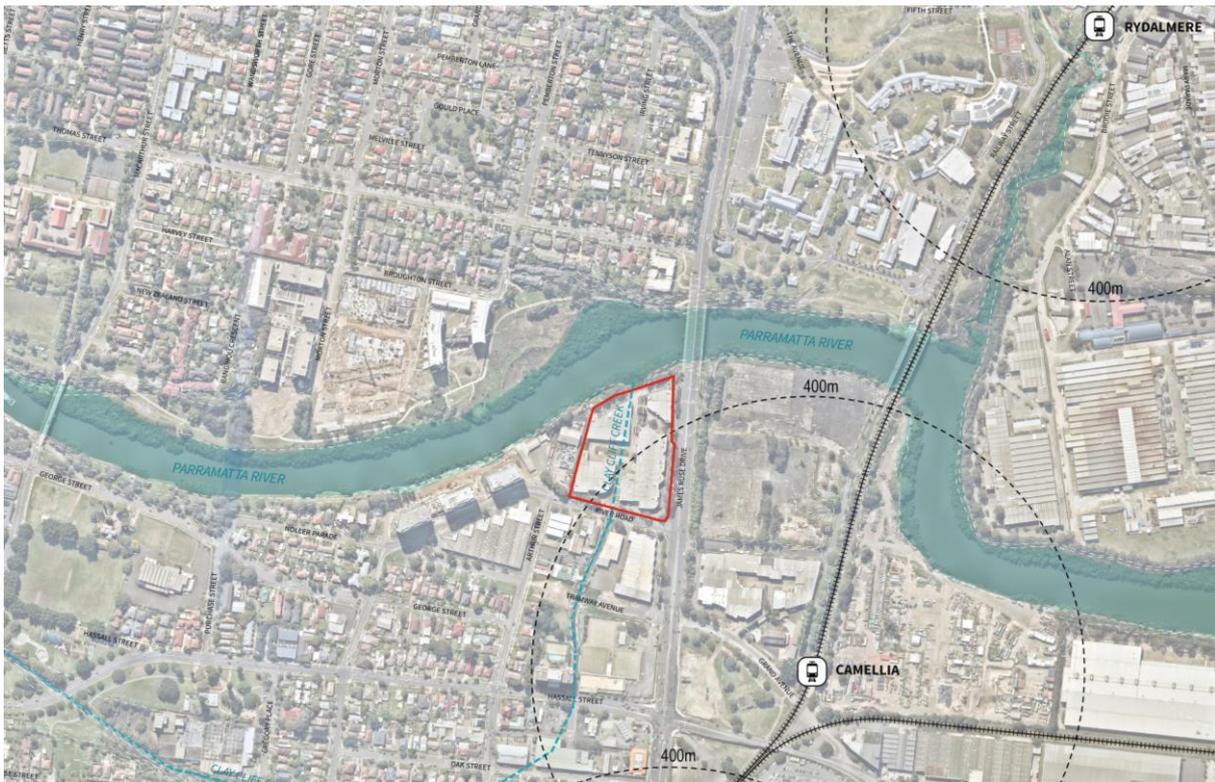


Figure 1 Aerial of the Site

Source: Ethos Urban

The Site forms part of Precinct 08 – Parramatta (River Road West & Alfred Street) identified in the Parramatta Employment Land Strategy 2016, which is earmarked for urban renewal (refer to **Figure 2**). Following the rezoning of adjoining land at 8-10 River Road West to B4 Mixed Use, it has been recommended that the broader precinct be regenerated so that it can transform into a desirable mixed use area that capitalises on its proximity to the Parramatta CBD, the Light Rail that runs through the Precinct and can enable realisation of river foreshore links along the southern banks of the Parramatta River. A Structure Plan is recommended for the Precinct.



Figure 2 Extract from the Parramatta Employment Lands Strategy 2016 showing the Site recommended for rezoning

Source: Parramatta City Council

2.0 Key issues of the Draft Camellia Town Centre Master Plan relevant to the Site

Ethos Urban has undertaken a review of the *Draft Master Plan* and considered a number of matters for consideration. The key relevant issues of the *Draft Master Plan* that have ascended from the investigation are described in further detail below.

2.1 Structure of proposed road network extending across James Ruse Drive

The *Draft Master Plan* proposes a new urban block and street structure which establishes the spatial framework for the town centre. This includes a hierarchy of east-west streets that provide legibility and connection through the precinct and a collection of north-south streets that connect to the river foreshore. The references to the existing street network to the west of James Ruse Drive, in particular River Road West, have formed strong influences informing the proposed new street network within the Camellia Town Centre.

A concern for the proposed street structure includes the proposal for a portion of the Foreshore Esplanade which extends along the boundary of open space along the Parramatta River Foreshore, continuing west across James Ruse Drive through the Site (refer to **Figure 3**). This structure proposes a road between the River Foreshore on the Site, intended to connect with a north-south extension of Alfred Street. Such a road incorrectly assumes an existing road along the Foreshore further to the west of the Site. Concern is raised for the impact of the proposed road upon the development potential of the Site. Recognising that there has been recent construction of parts of the Parramatta River Foreshore walk along this alignment reflects the intended public domain outcomes established during planning for this area. Due to the size and configuration of some of the sites there isn't the possibility of providing a continuous road along this edge. In addition, the introduction of a vehicle access road along this active public domain space would diminish the character and amenity that has recently been established and intended to be extended across the Site.

We recommend a review of the *Draft Master Plan* to remove the proposed road along the River Foreshore on the Site to be cognisant with adjoining development and present a more realistic street pattern on the west of James Ruse Drive.



Figure 3 Urban Design Principles showing proposed street structure for Camellia Town Centre Master Plan with the Site and subject road highlighted in red.

Source: *The draft Camellia Town Centre Master Plan*

2.2 Future Density and Traffic and Transport

The *Draft Master Plan* proposes a maximum capacity of 10,000 dwellings and 200,000sqm of non-residential floor space (approximately 8,850 jobs) under a medium scenario for the Camellia Town Centre. The supporting Traffic and Transport Assessment prepared by WSP suggests that these figures represent the maximum capacity of the precinct to accommodate additional density having regard to the proposed public transport options. The *Draft Master Plan* relies upon significant road and intersection upgrades, light rail and bus transportation options, and enhanced walking and cycling routes to improve access and mobility. The report notes that, “any development beyond the assumed yield will require further assessment to augment the transport response”. Larger scale mass public transport options are suggested should any further increase in density be considered.

The picture presented by the preliminary Traffic and Transport Assessment suggests that many of the surrounding roads are operating at capacity and that redevelopment of the Camellia Town Centre for mixed use development must occur in the context of significant public transport intervention. Concern is raised that the breadth of the traffic analysis and modelling does not sufficiently consider additional likely future density in areas outside of the Camellia Precinct. While areas such as Sydney Olympic Park, Wentworth Point, Carter Street and the Parramatta Road Corridor have been mentioned, it is not clear what assumptions have been made of other urban renewal sites, such as Precinct 08, and whether they have been given due assessment and if so, what assumptions were made.

Given Precinct 08’s immediate proximity to the Camellia Town Centre and its dependency upon James Ruse Drive and River Road West as the main access roads, there are concerns for the equitable consideration of this Site’s likely future density in the context of the Camellia Town Centre redevelopment. This is particularly relevant recognising that Precinct 08, which includes the subject Site, has similar characteristics to those of Camellia including:

- is a precinct transforming from industrial land uses to mix use;
- is closer to the Parramatta City Centre than Camellia;
- has frontage to the Parramatta River;
- will have frontage to, and a stop, along the new Parramatta light rail corridor;
- has been identified for rezoning and preparation of a Structure Plan; and
- is adjacent to recently developed sites within an area already under transition.

For these reasons, it is recommended that broader consideration be given to the impact of the proposed density envisaged by the *Draft Master Plan* upon Precinct 08 to ensure that there is equitable apportionment of density across similar urban renewal precincts within the broader Rosehill/Camellia precinct. Traffic modelling should reflect the maximum capacity of the broader precinct to more accurately determine whether there will be a negative cumulative impact upon surrounding sites and their ability to realise viable densities and ultimately ensure an equitable approach in the distribution of housing and employment across the broader precinct.

2.3 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 a Planning Proposal to be rezoned 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 Camellia Town Centre Precinct and its ability to support a maximum of 10,000 dwellings formulated on identified infrastructure provision, 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.

2.4 Proximity of the Site to the Camellia Town Centre

The subject Site is located within 200m of the proposed Camellia Town Centre. The Draft Master Plan aims to 'concentrate densities around the proposed Camellia Light Rail Stop and future retail core'. While James Ruse Drive has historically acted as a natural divide to the surrounding Rosehill and Parramatta City Centre precincts to the west, the proposed changes to the road corridor and introduction of light rail aim to form a primary link to a new town centre in Camellia for pedestrians and cyclists. Recognising that the Site is equally proximate to the new Camellia Town Centre as some of the sites to the east within the Master Plan precinct, the enhanced permeability across James Ruse Drive represents an opportunity to reimagine the precinct more broadly. This is aligned with the broader principles and objectives of the District Plans and reinforces the importance of the Greater Parramatta to Olympic Peninsula more holistically.

It is recommended that consideration be given to the natural relationship and similar characteristics of Precinct 08 (and the Site) to realise a more cohesive redevelopment of the Parramatta River Foreshore between the Parramatta City Centre and Camellia. In particular, land currently zoned for industrial purposes and being of similar character and opportunity. This is to ensure realisation of built form and densities reflective of the broader urban structure and spatial hierarchy proposed by the *Draft Master Plan* and supported by the proposed light rail, pedestrian and cycling connections which will improve accessibility across James Ruse Drive and along the River Foreshore.

We recommend that consideration be given to a more holistic appreciation of the urban renewal opportunities along the southern banks of the Parramatta River between the Parramatta City Centre and the Camellia peninsula.

3.0 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 activities, a mixture of supporting land uses and realise the revitalisation of the Parramatta River Foreshore. It is considered that the Site has similar characteristics to those of the Camellia precinct and will also be an important catalyst site in stimulating future development within the Greater Parramatta to Olympic Peninsula. We ask that due consideration be given to the issues raised in this submission.

Issue	Recommended Action
1. Structure of proposed road network extending across James Ruse Drive	<i>Revise the draft Master Plan to remove the proposed road along the River Foreshore on the Site to be cognisant with adjoining development and present a more realistic street pattern.</i>
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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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