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29 March 2018

Yolanda Gil
Director, Greater Parramatta Urban Renewal
Housing & Urban Renewal
Department of Planning & Environment
Level 4, 10 Valentine Ave Parramatta
Attention: Anthony Pizzolato

Dear Yolanda

**DRAFT CAMELLIA TOWN CENTRE MASTER PLAN
SUBMISSION**

This submission has been prepared by *KEYLAN Consulting Pty Ltd* (KEYLAN) in collaboration with *Allen Jack + Cottier Architects* (AJ+C) on behalf of The Billbergia Group in response to the Department of Planning and Environment's (DP&E) *Draft Camellia Town Centre Master Plan* (Draft Plan) which is currently on public exhibition until 29 March 2018.

We have undertaken a detailed review of the Draft Plan and generally support the Government's objectives for urban renewal of the Camellia Precinct and Town Centre. We acknowledge and support the vision for the Camellia Town Centre which will transform the area into a new town centre with contemporary employment and housing opportunities to support Paramatta and Western Sydney.

The *Greater Sydney Region Plan 2018* and the *Central City District Plan* have identified the Olympic Peninsula (GPOP) as the 'connected and unifying heart' of the Central City District. We note that the precinct is part of the *Next Generation Living Quarter* of GPOP, offering residents easy access to a range of work, study and enterprise opportunities. The Draft Plan and planning process to facilitate the delivery of the town centre is a critical catalyst to deliver these planning outcomes.

As you are aware, Billbergia is currently working with the City of Parramatta Council (Council) on the delivery of a major 10.3ha urban renewal precinct at Camellia to deliver substantial housing and employment opportunities with associated infrastructure and community uses. This scheme is currently subject to a planning proposal for the Town Centre within land owned and controlled by the Billbergia Group (Figure 1) (the Billbergia site).

The planning proposal for the Billbergia site was lodged with Council in July 2017 for approximately 4,198 dwellings, a new town centre with 27,500m² of commercial floor space, 20,000m² of retail floor space, 5.6ha of new open space and numerous community facilities. The development will significantly address the supply of residential dwellings to meet forecast demand. The planning proposal is currently under assessment by Council.

This submission undertakes a high-level review of the Draft Plan in the context of the Government's commitment to the urban renewal of the Town Centre addressing the following key issues:

- Role of Camellia Town Centre
- Equitable Allocation of Floorspace
- Building Height
- Built Form
- Street Network
- Transport and Carparking
- Delivery of future retail uses
- Remediation Strategy
- Flooding
- Infrastructure
- Feasibility and Delivery
- Community Facilities

This submission is supported by a report prepared by AJ+C, which makes a number of suggestions regarding typological requirements, block widths and street hierarchies. The report also details concerns that the overall density, unit numbers and parking proposed cannot be achieved due to restrictive built form controls.



Figure 1: Camellia Town Centre East Master Plan Planning Proposal (Source: AJ+C)

Role of Camellia Town Centre

The NSW Government has clearly identified Camellia as a key precinct to support Greater Parramatta and a range of planning objectives around achieving the 30-minute city. A comparison of Camellia with Sydney’s town centres is shown in Figure 2 below.

Billbergia supports the role of the Town Centre as a supporting centre for Greater Parramatta. The urban renewal of Camellia will deliver dwellings and employment opportunities for the expected population increase.

We also recognise the comparable status of Burwood Town Centre and Sydney Olympic Park with Camellia and the hierarchy of Sydney’s town centres. However, we contend that some of the proposed planning provisions for the Town Centre are more restrictive than other supporting town centres and may not enable delivery of the centre given the existing constraints.

The Town Centre will be a well-connected strategic centre with light rail infrastructure, near employment land and Parramatta CBD. The Town Centre is also located adjacent to one of Sydney’s key entertainment precincts, the Rosehill Racecourse.

As detailed in this submission, our analysis demonstrates that the Town Centre has the potential of providing more dwellings and employment opportunities to ensure the delivery of the Government’s aspirations for the precinct.

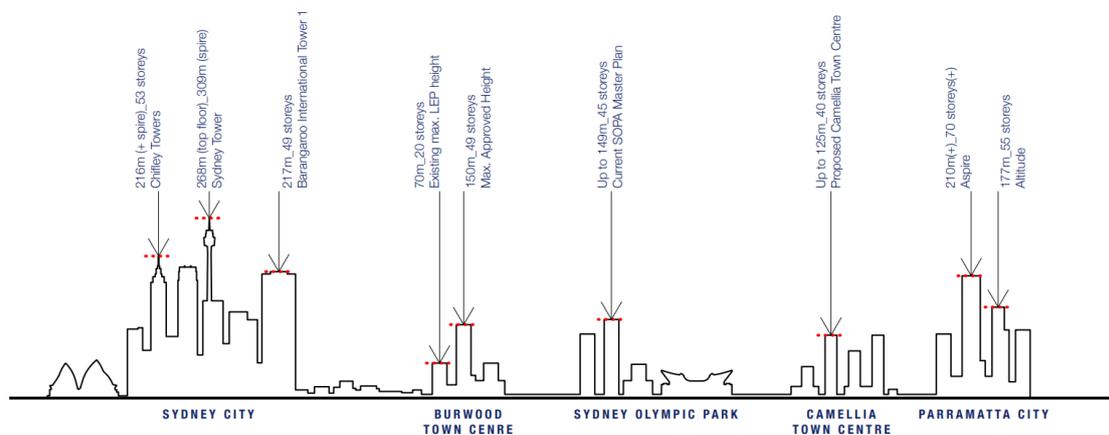


Figure 2: Comparison of Sydney’s town centres (Source: Hill Thalys Architecture + Urban Projects)

Recommendation 1

That the built form controls in the Draft Plan be revised to allow the Town Centre to achieve its role in the city hierarchy.

Equitable Allocation of Floorspace

We note that the Draft Plan proposes an increased floor space ratio (FSR) varying over the entire town centre site based on individual site opportunities and constraints. We generally support the principle of locating higher densities (FSRs) around the Town Centre retail core and the light rail stops.

The Draft Plan (Urban design principle 8 – Strategic Distribution of Density) states that the highest densities in Camellia Town Centre are to be concentrated to the west, around the light rail stop. We note that the Draft Plan includes the majority of the Billbergia site in the highest density area (Figure 3).



Figure 3: Urban Design Principle 8 – Strategic Distribution of Density
(Source: page 21, Draft Urban Design and Master Plan Report, DP&E)

We note that the while Draft Plan proposes FSRs of 4.5:1 and 4:1 over 64% of the Billbergia site (Figure 4), the other 36% is given an FSR of zero. The average FSR over the developable area is 4.21:1 and results in an approximate gross floor area (GFA) of 261,278 m².

Based on the analysis by AJ+C, the street layout and built form controls of the Draft Plan prevent the Billbergia properties from achieving their allocated FSRs.

AJ+C's analysis concludes that the 85% building efficiency used in the Draft Plan is too high, exceeding the 70-75% range established in the *Apartment Design Guide* (ADG), leading to an inflated unit count.

At high efficiencies of 90% gross envelope area (GEA) to GFA for commercial/retail and 75% for residential, the Draft Plan gives an achievable GFA of approximately 225,000m² equating to an FSR of 3.63. This is significantly less than the 4.21:1 allocated and will substantially reduce the potential yields for the site.

It is important to note that the Draft Plan disregards the existing property boundaries in the allocation of FSR. When averaged over the entire Billbergia site, the FSR falls to 2.34:1. This results in an FSR below current planning controls for some sites, leaving little incentive for redevelopment.

Billbergia proposes the embellishment of the proposed open spaces and the Sandown line in return for the re-allocation of FSR. This can provide additional non-residential FSR to supply efficient retail and office space for the proposed population, whilst not impacting the dwelling yield. This will result in a better design outcome as the proposed yield will remain achievable whilst open spaces are improved.

Based on the above analysis, we consider the Draft Plan will not deliver the proposed housing and employment targets.

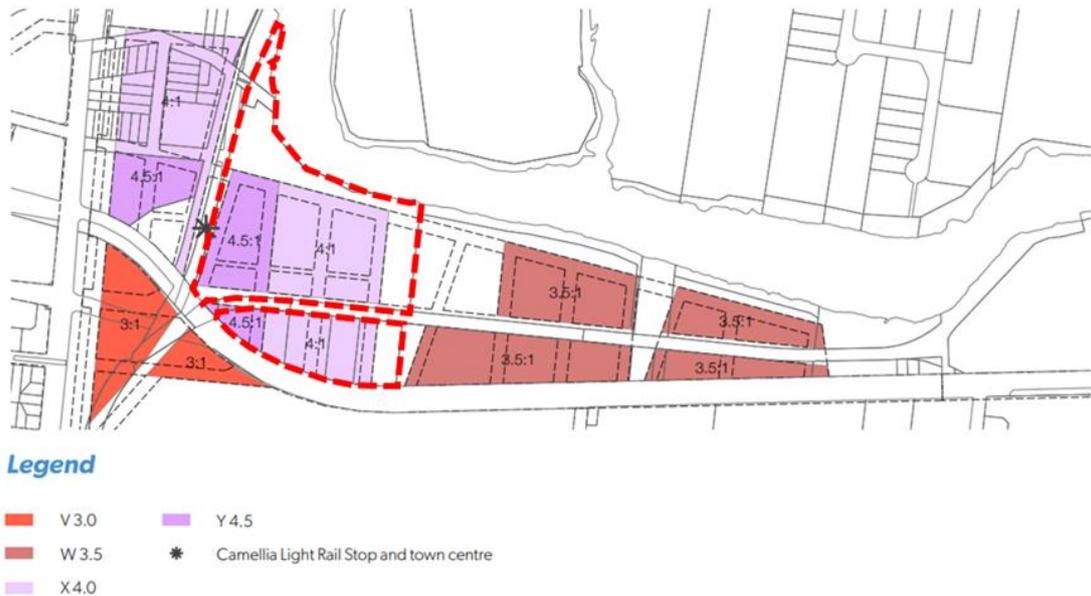


Figure 4: Proposed FSR in the Draft Plan (Site outlined in red) (Source: DP&E)

Recommendation 2

That FSR be allocated over the whole site, including proposed open space and road areas, to provide flexibility and to allow the reallocation of FSR on developable land.

Building Height

Height Limits

The Draft Plan proposes a range of heights, ranging from 5 storeys (15m) to 40 storeys (120m). We note that the Billbergia site has been identified as having a height range of 5 storeys (15m) to 36 storeys (108m) (Figure 5).

The tallest buildings in the Town Centre (40 storeys, 120m) are not located within the Town Centre retail core area. We recommend that the tallest buildings be relocated to the zone of highest densities as outlined in the Urban Design and Master Plan Report, which supports the Draft Plan.

Based on the above and analysis by AJ+C, the height limits are considered too low and will prevent the Town Centre from reaching its dwelling and employment targets.

Application of height controls

The Draft Plan proposals individual building heights throughout the Town Centre. It is unclear as to how the proposed heights in the Town Centre will be enforced through the *Parramatta Local Environmental Plan 2011* (PLEP) planning controls. The proposed towers are drawn as buildings rather than planning envelopes, thereby understating their potential impacts.

Further clarification of the application of building heights and building envelopes is required to ensure certainty of the proposed built form.



Figure 5: Proposed building height in the Draft Plan (Site outlined in red) (Source: DP&E)

Recommendation 3

That the proposed height limits be increased to enable the identified housing targets to be achieved and to enable a 40 storey building to be relocated adjacent to the light rail stop (within the Billbergia site) as detailed in Figure 11 of the AJ+C report.

Built Form

The Draft Plan shows a maximum building depth of 6 – 7m on the ground floor. This is not adequate for any of the ground floor uses shown.

It is proposed that a minimum building depth of 8m should be set to provide a rear corridor necessary to meet accessibility requirements into the units and through to the car park. An 8.5m building depth would allow a degree of flexibility in planning the residential units.

As advised by AJ+C, market standards for street-facing ground level retail requires a minimum building depth of 8 – 9m. A building depth of 6 – 7m is also not appropriate for commercial spaces.

The Draft Plan has not accommodated loading, storage and access requirements for commercial and retail uses. The accommodation of these uses in the Draft Plan will result in the removal of parking areas, which will further exacerbate the under supply of parking, as discussed below.

It is also important to note that no justification is given as to why the Camellia precinct exceeds the *Apartment Design Guide* (ADG) requirements.

Advice from AJ+C notes that the Draft Plan is more restrictive than the ADG for building controls such as building depths, building envelopes and floorplates. Requirements for higher cost, higher amenity units at fixed floor areas and building depths will result in a lack of diversity in the built form.

Recommendation 4

That the proposed building depths be increased to meet accessibility requirements and to allow for sufficient parking spaces.

That the built form controls be revised to align with the ADG.

Street network

We generally agree with the principles of a cohesive and connective street network which promote view lines and a riverfront esplanade.

We note the importance of clear north-south streets to create view lines, however to provide feasible development lots, it is recommended that the number of north-south streets be reduced.

Our analysis demonstrates that in some circumstances, the proposed north-south streets are only capable of performing as service lanes and are therefore unlikely to cater for the proposed population as intended in the Draft Plan.

A reduction in north-south streets will enable larger floorplates, which will contribute to achieving the dwelling target and provide for larger retail spaces. This will result in a better design outcome as the view lines will be maintained and the larger floorplates will allow for a more integrated development. It will also result in active frontages throughout the Billbergia site.

Deleting the service lane between lots K and J, L and M and O and P will result in combined lots with larger floor plates and parking for all lots.

We also raise concern with the proposed 5-way intersection joining Grand Avenue, Sandown Boulevard, Camellia Street, Hassall Street and the Light Rail line. The intersection requires further work as it incorporates awkward road connections, two dead end streets and results in inefficient development lots.

This intersection and public square requires further analysis.

Recommendation 5

That the number of north-south streets be reduced to enable larger development lots and rationalised connections to service future communities.

That the street network within the Draft Plan be revised to create a more efficient street network.

Transport and Carparking

We note that the Draft Plan identifies a potential option for car parking, which involves the provision of parking above ground within the building's podium, with non-residential uses and residential uses sleeving the podium car parking, addressing the street.

We note this includes a remediation strategy that in general seeks to cap and seal the site, with no basement carparking. We have undertaken a high-level review of the *Transport and Traffic Assessment* (WSP report) and make the following comments:

Carparking

We note that the maximum carparking rates proposed in the WSP report are lower than the carparking rates proposed in the Billbergia planning proposal.

The maximum carparking rates permit approximately 12,800 parking spaces for a mixture of residential, commercial and retail uses. However, findings from the AJ+C report show that only between 3,500 – 4,250 parking spaces are possible in the floor area allocated to parking in the Draft Plan.

The Draft Plan does not propose any parking for several blocks within the Billbergia site.

The lack of parking will put a significant strain on the Town Centre's ability to cater for residents and commercial and retail uses. To alleviate the car parking deficit: basement parking should be permitted throughout; the 3-storey above-ground parking restriction should be removed; and lots without parking capacity should be merged with adjacent lots.

We also note the 90-degree angle car parking proposed along the north side of the street named 'Foreshore Esplanade', will reduce the width of the riverfront park. We recommend this be changed to standard parallel parking to expand the park area and reduce the distance with the buildings to the south.

Traffic Generation

We recommend a revision of the traffic trip generation rates as adopted in the WSP report. The adoption of high trip generation rates is not considered appropriate, particular in a TOD development such as Camellia.

We note that the WSP report calculates trip generation rates using the development yield, where in contrast the Billbergia Planning Proposal is calculated based on car parking provision. Given the restricted provision of car parking proposed in both schemes, the trip generation per car space method as proposed in the Billbergia Planning Proposal is considered to be more appropriate in this instance.

Recommendation 6

That the parking strategy be reviewed to address the parking deficit in the Draft Plan.

That the vehicle trip generation rates be calculated based on car parking provisions rather than development yield.

Delivery of future retail uses

The Draft Plan seeks to deliver up to 200,000m² of commercial and retail employment floor space.

AJ+C has undertaken a review of the Draft Plan and estimates that approximately only 50,000m² of commercial and retail floor gross envelope area has been provided in the Draft Plan.

The provision of parking within the building podium with sleeve retail has limited the floorplates for retail spaces, and therefore, limits the viability of retail opportunities within the Town Centre.

It is estimated an additional 42,000m² of commercial and retail employment floor space could be accommodated within the Draft Plan if the entire area allocated for parking spaces within the podium is replaced, as well as residential units on certain blocks.

Alternative locations for the displaced parking spaces and residential units have not been identified.

As discussed above, the proposed parking for retail in the Draft Plan is insufficient to cater for the retail uses required to service the Town Centre and incoming population (e.g. supermarkets).

Recommendation 7

That the floorplates be increased to allow for a greater range of retail opportunities.

That the maximum parking rates for retail uses be revised to provide sufficient parking for appropriate retail uses to support the future Town Centre.

Remediation Strategy

The Camellia Precinct has a long history of industrial development which has resulted in precinct-wide contamination.

The Draft Plan notes that individual developers may opt for an alternative remediation approach but must be consistent with the public domain levels identified within the Landfill Strategy to ensure a uniform ground plane.

We understand that the Town Centre is impacted by contaminants such as asbestos, metals, hydrocarbons in groundwater and potential acid sulfate soils.

The Draft Plan has significantly under-estimated the value of remediation cost on the Billbergia site to be only \$2.9m to \$3.4m.

Billbergia have engaged an independent expert to provide remediation cost estimates for the rezoning and future redevelopment of the Billbergia site. This analysis has identified a preferred remediation option for the proposed development of a mixed-use retail/residential development with multilevel basement carparking with an estimated cost of approximately **\$98.6m**.

This option assumes that the proposal will require excavation of fill and placement within a designated area onsite (encapsulation), excavation, disposal of potential acid sulfate soils and other necessary treatments.

We note that the contamination study prepared by Golders for the Draft Plan adopts a scenario to make the site suitable for commercial/industrial use. This scenario does not align with Billbergia's proposed use of the site as mixed-use retail/residential or the proposed uses within the Draft Plan.

The remedial scenario that Golder has adopted is based on the premise that the site is to be made suitable for commercial/industrial use. This does not align with Billbergia's proposed use of the site as mixed-use retail/residential.

The proposed remedial options presented by Golder do not include remediation of the site foreshore, the southern lots or a portion of the Sandown railway line (between the main site and southern lots). This is a significant additional cost and leads to serious ramifications to the feasibility of the project, particularly when combined with the proposed built form and public domain controls proposed in the Plan.

A revised remedial action plan will be prepared for any future work on the Billbergia site.

Billbergia can provide a more detailed report on request.

Recommendation 8

That the contamination report prepared for the Town Centre be revised, to acknowledge the remediation estimates and assumptions outlined above.

That the information above be considered when reviewing proposed built form and public domain controls.

Flooding

The Town Centre is subject to flooding from the Parramatta River, Duck River, Duck Creek and A'Becketts Creek. The Billbergia site is identified in Council's records as being subject to flooding. Council's *Lower Parramatta River Floodplain Risk Management Study March 2005* shows the site as being partly inundated in the 20 year and 100 year average recurrence interval (ARI) storm events.

We note that the Draft Plan considers flooding to ensure it is managed throughout the whole of the precinct and that any development managing flooding does not impact on proposed adjoining developments and its surrounds and the public domain.

Council's 2005 study sets a different probable maximum flood (PMF) level in comparison to the Draft Plan's associated Flooding Report. The associated Flooding Report resulted in a significant reduction to the PMF levels outlined in Council's study.

A review of the Draft Plan's associated Flooding Report concludes that impacts in the 100 year ARI are negligible due to the landfill strategy. We believe that impacts relative to the PMF are impractical and it is unusual to subscribe nil impacts during the PMF.

The model within the associated Flooding Report informs the nature of development within the precinct. This has the potential to increase the timing and costs of a future project. A third-party review will confirm the model and any flooding impacts for the precinct.

Recommendation 9

That DP&E further consult with Billbergia and their flood consultant to provide further clarity in the flood maps produced to date (such as PMF difference mapping and key legends in the impact maps).

That the associated Flooding Report be independently verified by a third party to reduce any unnecessary delays for future development.

Infrastructure

We support the provision of community facilities and required infrastructure for the Town Centre, which will cater for 10,000 new residents.

The planning proposal for the Billbergia site proposes to deliver a range of public benefits to the area, including new infrastructure (including bridges), community facilities, landscaped foreshore park areas and public domain and connecting walkways and cycleways.

To assist with the early delivery of the enabling infrastructure for the Precinct, Billbergia has offered to deliver several key items throughout the redevelopment of their site. Billbergia has experience in the delivery of major infrastructure items having built the Homebush Bay Bridge (Bennelong Bridge) in 2015. This bridge is widely acknowledged now as a critical asset in improving public transport access for residents of Wentworth Point. This infrastructure was delivered efficiently and cost effectively through a voluntary planning agreement (VPA).

Camellia will benefit in a similar way if developers are more directly engaged in the infrastructure delivery for the area.

The early and efficient delivery of required infrastructure in the Town Centre will result in a positive outcome and will unlock further potential within the Town Centre to provide more dwellings and job opportunities.

We note the Draft Plan recommends that a new bridge over Duck River to Carnavon Street / Silverwater Road, including intersection upgrades and a cycleway be funded through a special infrastructure contribution (SIC). The Billbergia Planning Proposal identified as a potential infrastructure item to be delivered through a VPA associated with.

Given their track record, Billbergia urgently seeks further discussions with Government on appropriate delivery mechanism to ensure early deliver of this critical infrastructure to serve the new community and address existing employment uses.

Recommendation 10

That the DP&E investigate a variety of mechanisms to deliver key infrastructure items for the Precinct in consultation with key land owners.

Feasibility and Delivery

The Draft Plan proposes to deliver 10,000 dwellings and 5,000 jobs within the Town Centre.

As outlined above, the allocation of FSR and height in the Draft Plan cannot deliver these identified dwelling and job targets.

The maximum tower footprint of 750m² and no basement parking further restricts the number of dwellings and retail floorspace that can be achieved within the Town Centre.

Billbergia has engaged an independent expert to carry out feasibility modelling to ascertain the impact of the built form controls proposed in the Draft Plan.

This analysis has identified that the built form controls proposed in the Draft Plan will result in development with marginal feasibility and will not leave capacity for landowners to contribute to other infrastructure items, whether through a VPA or SIC levy.

Recommendation 11

That DP&E further consult with Billbergia regarding feasibility and delivery.

That the built form controls for the Billbergia site be amended in order to enable the delivery of infrastructure items and the dwelling and job targets identified in the Draft Plan.

Community Facilities / Park

We support the provision of adequate community and social infrastructure and support services for the future population. Billbergia is planning to deliver a range of public benefits as identified in the planning proposal for the Billbergia site.

The following community and social infrastructure has been identified on the Billbergia site:

- Riverfront Park and Boardwalk;
- Potential new library, square and park; and
- Sports field and amenities (in association with the potential new school on the GPT land).

Community and social infrastructure has been distributed throughout the Town Centre. We believe the relocation of the community facilities closer to the retail core and denser residential areas would result in a better design outcome and more cohesive Town Centre.

The provision of this social infrastructure by Billbergia results in certainty on early delivery of facilities which are better located to the retail core of the Town Centre, closer to higher density residential areas and the light rail station.

The Draft plan establishes a Town Square adjacent to the confirmed light rail stop. However, only one of the four proposed community facilities are located near the light rail stop.

Recommendation 12

That key community facilities be relocated closer to the light rail stop as detailed in Figure 10 of the AJ+C report.

That DP&E provide clear policy direction for potential offsets to future SIC and Section 94 Items for the provision of key enabling infrastructure items, including social infrastructure.

Summary of benefits

The proposed amendments to the Draft Plan as detailed in this submission maintain the overall objectives, principles and integrity of the Draft Plan. These amendments seek to ensure the timely delivery of the Town Centre, which will provide the following benefits:

- Built form controls consistent with the ADG
- Provision of adequate car parking
- Higher densities and community facilities located close to the light rail stop
- Early delivery of key infrastructure items in a timely manner
- Larger floorplates for retail and residential uses whilst maintaining views to the Parramatta River
- Improved street network
- Achievable dwelling and job targets

Conclusion

The Billbergia Group has a strong track record in working closely with government to produce environmentally, economically and socially beneficial developments. Based on this report, we recommend that the final Master Plan be amended to allow the Billbergia site to achieve the proposed yields with respect to the opportunities and constraints outlined in this report and the specialist reports attached.

Given the significance of this project to the urban renewal of the Camellia Precinct, GPOP and the City of Parramatta, we request that the DP&E convene a meeting with the Billbergia and relevant consultant team to discuss the issues raised in this submission.

We look forward to continuing to work with DP&E and Council to provide much needed residential accommodation and a new town centre in the Parramatta LGA, consistent with the vision outlined in the *Draft Camellia Town Centre Master Plan*.

Should you require any additional information, please do not hesitate to contact Michael Woodland on 02 8459 7506 or email michael@keylan.com.au in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M Woodland'.

Michael Woodland BTP
Director

A handwritten signature in blue ink, appearing to be 'D Keary'.

Dan Keary BSc MURP MPIA
Director