This submission has been prepared by KEYLAN Consulting Pty Ltd in collaboration with Architectus on behalf of the Australian Turf Club (ATC) in response to the Draft Camellia Town Centre Master Plan (Draft Master Plan) which is on public exhibition by the Department of Planning and Environment (DP&E) until 29 March 2018.

**Consultant team**

The ATC has commissioned an expert multidisciplinary team to critically analyse the Draft masterplan in the context of ATC landholdings including the following consultants:

- Project Managers – Mostyn Copper Group
- Urban Planners – KEYLAN Consulting
- Urban Design – Architectus
- Civil / Flooding – Northrop
- Contamination – ADE Consulting Group
The Australian Turf Club (ATC) own and operate the Rosehill Gardens Racecourse - an internationally recognised racecourse which hosts major events throughout the year, including both race day and non-race day events. The site has a significant role within the Parramatta LGA as a key entertainment precinct attracting visitors and residents from all over Greater Sydney.

The Draft Master Plan includes part of the ATC site within the Camellia Town Centre boundary. This land comprises a triangular shaped parcel of land, approximately 5 hectares in area, bounded by James Ruse Drive to the west, Grand Avenue to the north, the racecourse to the east and Hope Street to the south.

This submission responds to the Draft Master Plan in relation to both the potential implications on the operation and role of the Racecourse as well as opportunities to contribute to the Town Centre, Precinct and Greater Parramatta. The racecourse function will continue to operate as it does at present.

The ATC is generally supportive of the overall vision for the Camellia Town Centre outlined in the Draft Master Plan. We propose some amendments which will improve the Draft Master Plan, particularly in the way it relates with the racecourse and surrounding ATC land. The racecourse plays an important role in creating a unique Camellia Town Centre. We note that the Government has announced the closure of the Clyde to Carlingford line, which raises significant operational issues but also potential opportunities to improve access through the new Town Centre.

As well as being identified as part of the Camellia Land-use and Infrastructure Strategy released by the Department of Planning and environment (DP&E) in 2015, the ATC have been formulating their own Draft Master Plan for their site which will have requirements for connections to, and interface with, the proposed Camellia Town Centre.

The amendments will result in the following public benefits:

- improved pedestrian access to the racecourse to address the Governments’ announcement to close the T6 Carlingford heavy rail line and Rosehill Station,
- provide a unique opportunity to integrate the racecourse as a key feature of the Town Centre,
- better pedestrian connections to public transport.

The recommendations are summarised below:

1. That the DP&E amend the Town Centre Boundary to the south to allow for an improved urban outcome on ATC landholdings; better access and connectivity to the racecourse; and facilitation of non-residential uses for the Town Centre.

2. That the DP&E amend the Draft Master Plan as it relates to ATC site as follows:
   - realign the street layout to align with ownership boundaries,
   - provide a more direct pedestrian route from the racecourse entry to the light rail stop,
   - realign the proposed street layout to improve access and create more efficient development blocks,
   - activate the connection between the light rail stop and the racecourse with ground level retail uses,
   - locate proposed towers on the ATC land close to the light rail stop.

3. That the DP&E amend proposed planning controls to ensure equitable and workable allocation of floorspace on the ATC land to reflect its close location to the Town Centre and allow flexibility to provide a wide range of land-uses to support both the Town Centre, racecourse and surrounds.

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Camellia is an important part of the Parramatta Central City. Located less than 2km from Parramatta City Centre and with a future light rail connection allowing travel between the two centres in less than 10 minutes, the redevelopment of Camellia will support the 30-minute city and will play an increasingly more diverse and complementary role to Parramatta.

Located in GPOP’s centre, Camellia is a major hub for Central City - this unique centrality means that Camellia has developed as one of the most important employment precincts in Greater Sydney. Camellia has great strategic value, given its location, activity and opportunities for future development and renewal.

The Greater Parramatta Interim Land Use and Infrastructure Implementation Plan (LUIIP) sets the vision for the site as the ‘Rosehill Gardens entertainment and leisure precinct’.

The Central City District Plan aims to strengthen the economic competitiveness of Greater Parramatta by providing a range of cultural, entertainment, arts and leisure activities. Rosehill Gardens is a significant recreational asset for the Central City, providing the catalyst for the precinct to become a world class recreation and leisure destination.

The Greater Sydney Commission’s vision for GPOP sees the evolution of the site as ‘Next Generation Living from Camellia to Carlingford’, comprising:

- living, learning and leisure district
- mix of medium to high-density housing types
- education, research, retail, recreation

Camellia will be within one stop of the Western Sydney University campus, with over 15,000 students, and combined with a young, highly educated population (20% of the population in GPOP is aged 25-34), there will be changing lifestyle preferences, and a transition to higher density urban living in the Central City.

The redevelopment of the precinct will be focused around a new town centre, with up to 10,000 new homes, 5,000 jobs and creation of a new waterfront park and a river front promenade connecting Camellia to Parramatta CBD and Sydney Olympic Park.

The Greater Parramatta Interim LUIP is accompanied by a local planning Direction which provides a sound basis for a Planning Proposal for the site in line with the NSW Government’s vision.
**Rosehill Gardens current activities**

**Existing operations at Rosehill Gardens Racecourse**

The Australian Turf Club (ATC) is a not-for-profit organisation with all income reinvested for the benefit of its members and the thoroughbred racing industry.

The ATC has a substantial membership base of almost 15,000 members, and owns or controls over 260 hectares of some of the most significant property holdings across the Sydney Metropolitan region. These property holdings consist of land encompassing and surrounding ATC’s four Sydney racecourses being Royal Randwick, Rosehill Gardens, Warwick Farm and Canterbury Park.

The Rosehill Gardens Racecourse is located on James Ruse Drive, Rosehill, approximately 1.5 km from the Parramatta CBD and 5 km from Sydney Olympic Park. It is part of an area identified by the DP&E and City of Parramatta as the Camellia Precinct.

The racecourse currently enjoys heavy rail access directly into the grandstand precinct, with the Rosehill Station located within the site as part of the T6 Carlingford line. We note the Government has announced the closure of this line, which raises significant operational issues for the racecourse but also potential opportunities to improve access to the new Town Centre.

The racecourse is approximately 80 ha. in area and features a number of significant buildings including:

- Recently refurbished JR Fleming Stand and betting ring
- Grand Pavilion
- Exhibition Hall
- Horse Stabling Precinct
- Barrier Trial Stripping Stalls
- Race Day Stalls

The racetrack occupies approximately 55 ha. of the site as open space forming a buffer between development to the west and industrial uses to the east and south east.

**Rosehill Gardens visitors**

The ATC and associated Rosehill-based horse trainers are the major employer in the Precinct, with over 200 people permanently employed by ATC, plus many casual staff and contractors involved in both raceday and non-raceday events.

In 2016-17, over 150,000+ patrons attended raceday events and 300,000+ during non-raceday events at Rosehill Gardens.

These numbers are expected to increase as the ATC continues to improve its facilities, with further increases expected following the rezoning and transformation of the Camellia Precinct.

**Non-race day events**

Rosehill Gardens is at the forefront of the Sydney events and functions industry. Recent winners at the 2017 National Restaurant & Catering Hostplus Awards for Excellence NSW – Function & Convention Centre Caterer, Rosehill Gardens offers world-class, multi-purpose venues accommodating everything from small executive meetings to large scale industry events, exhibitions and festivals.

Offering 34 unique venues, making the property the largest function and conference centre within Western Sydney. Rosehill Gardens is an award winning premier destinations suitable for all business or personal events.

Events cover a wide variety of activities, including corporate events, trade shows, entertainment and community events.

Major events include:

- The Caravan and Camping Show (over 80,000 visitors each year – in operation until 2021 – the largest of its kind in Australia)
- Sydney Santa Spectacular (35,000 visitors)
- The Stitches and Craft Show (12,000 visitors)
- The Pool and Spa Outdoor Living Expo (7,000 visitors)
- Multiple large dinners each month that attract from (200 – 1500 attendees)
- Board of Studies HSC Marking (3.5 months duration)
- Six Community Festivals each year attracting (1,000 – 10,000 attendees)

**Equine activities**

The thoroughbred racing industry makes vital economic and social contributions to Australia.

Its economic value to the national economy is estimated to exceed $5 billion annually, including more than $1 billion contributed in Federal and State taxes and $2 billion through exports and imports.

Australia’s thoroughbred racing industry also provides employment for more than 65,000 people, particularly in regional areas. These Australians, either directly or indirectly, are employed full-time, part time or casually in areas that produce and train racehorses, run race clubs or work in industries that provide goods and services to the sector.

An estimated 80% of these jobs are across New South Wales, Victoria and Queensland.

First contested in 1957, Rosehill Gardens is the home of the Golden Slipper, the world’s richest race for two-year-old thoroughbreds.

The equine activities at the racecourse are fundamental to its successful operation as one of Sydney’s premier racetracks.
Rosehill Gardens future Vision

The ATC is currently formulating its vision for its land in and around the Rosehill Gardens Racecourse. The ATC has identified six key vision principles:

1. International draw card

Rosehill Gardens will be a local, national and international draw-card. It will be referred to in the ‘Lonely Planet’ guide to Australia as the Oasis on a weekend trip in Sydney: ‘Catch the ferry up the Parramatta River, experience the romance of racing, the hanging gardens and craft brewery, before continuing on to Parramatta CBD and your train trip to the Blue Mountains’.

2. Local Place

At the same time as being an international attraction for elite thoroughbred racing, Rosehill Gardens will be an entertainment and leisure precinct which is truly integrated into the local community and town centre. Facilities here will cater not only to race day and special occasions but provide for the everyday needs of the community. Although the racing facility itself will have secure entrances, the wider site should provide highly permeable streets and links, connecting with the town centre and light rail.

3. Activities

Build on the success of the racecourse and plan for the evolution of the site in line with the GPOP vision for a mixed use, entertainment and leisure precinct. Retain and enhance racing uses and add supporting dining and recreational facilities as well housing and jobs in order to support the local and regional economy of Parramatta and Western Sydney.

4. Romance

Build on the romance of the name: ‘Rosehill Gardens’ and on the romance of racing, with the retention of the existing racecourse function. Provide a new and highly visible contemporary identity for the racecourse from James Ruse Drive and Grand Avenue. Built form arranged around a series of landscaped courtyards and plazas and a network of pedestrian connections to provide cool alfresco retail and entertainment opportunities. Residential and mixed use towers above will have access to views of the racecourse—a unique visual respite in a future high rise town centre.

5. Green

Where Parramatta Park is the unprogrammed, recreational green lung to the west of Parramatta CBD, Rosehill Gardens will be the programmed green lung to the east of the CBD. Include landscape as a key element of the precinct, integrated with the built form. The landscaped rail easement has the opportunity to connect Parramatta and Duck Rivers, and the foreshore routes, as well as providing a connection to the new light rail stop.

6. Town Centre

Located in GPOP’s centre, Camellia is a major hub for Central City. In the same way as Double Bay or Surry Hills complement the Eastern City, Rosehill Gardens will complement the new town centre and Central City, with a boutique offer relevant to community and visitors alike. There will be an improved entry and connection to the racecourse from the town centre.
Next Generation Living

The Greater Sydney Region Plan 2018 and the Central City District Plan have identified the Greater Parramatta and Olympic Peninsula (GPOP) as the ‘connected and unifying heart’ of the Central City District. The Camellia 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 strategic location and operation of the racecourse is a crucial consideration in the Draft Master Plan. The Racecourse is located within an urban renewal area in the Central City. Opportunities for urban renewal are to be considered based on location and capacity of existing and proposed infrastructure.

Recreation and entertainment

The ATC site will act as a major mixed use / entertainment precinct, with a mixture of residential, employment and recreation opportunities, centered around the enhanced racecourse function.

The Camellia Town Centre is envisaged to be a new town centre on the Parramatta River for the community to enjoy beautiful parks and open spaces, with a revitalised river front and an active street life that is connected to Greater Parramatta. The role of Camellia Town Centre is to support Greater Parramatta.

The Racecourse has the unique opportunity of providing entertainment uses for the Greater Parramatta region. Unlike the rest of the Camellia Town Centre, the ATC site has existing entertainment uses that draw in visitors from all around Greater Sydney. It facilitates a number of raceday and non-race day events throughout the year.

Transport

The racecourse is currently serviced by the T6 Carlingford Line. Rosehill Station is located at the entrance of the racecourse, providing an accessible and direct path from the railway line to the ATC site.

Government has announced the closure of the T6 Carlingford Line. This means that the ATC site will be serviced by the two light rail stations proposed north of Grand Avenue. The site will no longer have a direct accessway to the site. Therefore, it is essential to ensure connectivity from the Town Centre and light rail station to the racecourse, as the Rosehill Station will no longer provide direct access to the racecourse.

The racecourse is strategically located within walking distance of the proposed Parramatta Light Rail and has proximity to the Camellia industrial area. The Parramatta Light Rail acts as a catalyst for realising the vision of GPOP as a connecting and unifying corridor of the Central City. The urban renewal of the Camellia Precinct is dependent on the light rail to facilitate transit-oriented development.

Heavy rail

The railway reservation is predominantly between 25m – 30m wide and 40m wide around the existing Rosehill Station, transecting the site in a north-south direction.

The closure of the heavy rail line and station has significant implications, including:
- changes to pedestrian access to the racecourse;
- distance between the racecourse and public transport, and
- impact on the grand entrance to the Racecourse.

Parramatta Light Rail

The Parramatta Light Rail (PLR) will connect the Parramatta CBD to key areas being transformed in the Greater Parramatta region. Stage 1 of the PLR will connect Parramatta and Westmead to Carlingford via Camellia.

The ATC support the location of the proposed PLR stops within the Camellia Town Centre, subject to the pedestrian access from the stops to the racecourse entry being improved.

Traffic and access to the site

Parramatta Road, Victoria Road and the M4 Motorway all service the site.

Vehicular access to the racecourse is from Grand Avenue in the north of the site and Unwin Street in the South. Grand Avenue connects to James Ruse Drive via an overpass over the railway line.

The Camellia Precinct is bounded by a number of regional roads however access to the Camellia Town Centre is currently heavily constrained to one entrance via Hassall Street / Grand Avenue.

Opportunities to improve the road network include:
- improved works to James Ruse Drive to improve connectivity;
- construction of pedestrian / public transport bridges over Parramatta River and Duck River, and
- Access to the racecourse is currently limited to access in the north from Grand Avenue and access in the south from Unwin Street, connecting to Parramatta Road.

James Ruse Drive

James Ruse Drive adjoins the site along its western boundary. The DP&E has been working with Transport for New South Wales (TNSW) and Roads and Maritime Services (RMS) to identify future upgrade requirements for James Ruse Drive.
Flooding
The Camellia Precinct is subject to flooding from the Parramatta River, Clay Cliff Creek, Duck River, Duck Creek and A'beckett's Creek.

Assessments have been undertaken by Cardno including the Camellia Town Centre Landfill Strategy – Draft Flooding and Contamination Study – January 2018, and Stage 1 and 2 Reports – Camellia Precinct – Drainage and Flooding Study – June 2015. These have been completed in order to amalgamate studies undertaken for the different watercourses and assess both the existing conditions, and developed conditions including the proposed Town Centre.

Portions of the ATC site, as well as the wider Town Centre site are subject to a High Flood Risk Precinct. This is characterised by either high hydraulic hazard in the 1% AEP (Annual Exceedance Probability – commonly referred to as the 100 year flood), or a site with evacuation difficulties.

It is encouraging that the DP&E is assessing development on a precinct scale as there is opportunity within the whole precinct to mitigate flood impacts that may be generated off-site. To this end, the landfill strategy has included an open space corridor on the eastern side of James Ruse Drive to convey flow in the 1% AEP towards the Parramatta River, limited fill to the north of Grand Avenue, and included hollow building shells in the model to allow flood storage in the PMF (Probable Maximum Flood) event. Emergency evacuation is proposed by Cardno along the light rail line before heading north on James Ruse Drive. Shelter in Place is also considered a viable alternative for emergency response.

The results of the flood impact assessment include a negligible change in the 1% AEP and an impact deemed acceptable by Cardno in the PMF, understood to be in the order of 200mm. Furthermore, the PMF level calculated in this analysis is currently lower than that adopted by the City of Parramatta for development assessment.

Remediation
The Camellia Precinct has a long history of industrial development which has resulted in precinct-wide contamination. The ATC site has been identified as having a medium risk of contamination.

Contamination on the site will be addressed with State Environmental Planning Policy 55 – Remediation of Land (SEPP 55), the Managing Land Contamination Planning Guidelines (Contamination Guidelines) and the relevant precinct-wide approach to managing contamination, which will be prepared when rezoning the Camellia Town Centre.

Sewer easement
The site is burdened by a sewer line, as shown on the adjacent diagram.

Development within the zone of influence of the sewer will be architecturally designed to avoid any impact on the sewer.

Fuel line
A high pressure fuel line currently traverses the Town Centre site along Grand Avenue and up the T6 Carlingford Line.

Recommendation 1
DP&E further consult with ATC and on flooding issues
The ATC and consultant team generally support the Vision and Principles contained in the Draft Master Plan.

We believe that the platform of the Draft Master Plan is based on sound urban design principles to support the town centre development at Camellia.

Notwithstanding, this submission seeks to amend the Draft Master Plan with an alternative master plan / with an amended boundary as it relates to ATC land.

This proposal follows a detailed review of the Draft Master Plan in the context of the ATC land holdings, in particular the vision for the racecourse and surrounds.

**Urban Design Principles**

The ATC alternative master plan is based on the following key urban design principles:

1. The racecourse streets, public domain, open space, land use and built form to be fully integrated with the Town Centre.

2. Distinctive identity and entrance to the racecourse from the Town Centre, with a simple and legible entry point for pedestrians and vehicles.

3. Direct and convenient connection to the proposed Town Centre light rail stop.

4. Connect leisure and entertainment uses associated with ATC land to the River via open space.

The key resultant changes primarily relate to the street grid, pedestrian access, public open space, entry to the racecourse, built form, land uses, floor space ratio and the town centre boundary, and are discussed in more detail in this submission.

1. Integrated with the Town Centre

2. Entry and identity

3. Connection to light rail

4. Connection to River
**Street Grid**

**Realignment of Hassall Street**

The recent Government announcement to close T6 Carlingford line requires careful consideration of the proposed road network, in particular access to the racecourse.

The proposed alignment of Hassall Street is not an optimal solution in relation to ATC landholdings, in particular it:

- limits connectivity from the town centre to the racecourse;
- creates inefficient development lots;
- limits ATC’s ability to deliver genuine mixed-use development to support and add to the unique character of the Town Centre, and
- limits much-needed access to the racecourse following the proposed closure of the heavy rail line.

The ATC alternative master plan realigns Hassall Street to emphasise it as the main vehicular corridor leading to Grand Avenue and to follow existing property boundaries.

**North-south streets**

We generally support the principle of north-south streets connecting the Town Centre and River.

However, we recommended a new north-south street to provide direct access to the ATC site to enable a direct link between Parramatta River and the racecourse. This connection also improves access to the ATC site and integrates it with the Town Centre.

The new street will also create a clear visual entry to the racecourse.

The amended street layout transforms the challenging triangular building footprints into larger, more viable development lots. The building footprints will continue the block typology developed for the majority of the Town Centre in the Draft Master Plan.

**Revisions to the street layout made in the alternative master plan include the following:**

- proposed street reservations follow ownership boundaries/ existing road locations, (e.g. Hassall Street)
- 6-way intersection replaced with direct orthogonal 4-way cross-intersection
- a new public square between Tramway Avenue and Hassall Street by realigning the streets
- build on the Draft Master Plan north-south streets connecting with the river by extending the ‘Camellia street’ into the ATC site, through the town centre and to the river
- create a clear and direct entry to and identity for the racecourse via the proposed new street
- emphasise Hassall Street leading to Grand Avenue as the main vehicular entrance to the Camellia Town Centre.

**Recommendation 2**

That the revised street network be adopted in the Camellia Town Centre Master Plan
The large number of patrons on both race day and non-race days at the racecourse and the anticipated increase in patronage will provide a significant social, economic and cultural benefit to the Town Centre.

It is essential that pedestrian access to the racecourse from the light rail stops be carefully assessed at this planning stage. This issue is even more critical given the future closure of the Rosehill Railway station which currently provides direct, immediate access from the station to the racecourse for large volumes of pedestrians.

The Draft Master Plan does not provide clear, direct access between the light rail stop and the proposed new racecourse entry and future entertainment precinct.

The Draft Master Plan requires pedestrians and patrons to cross a number of roads to reach the racecourse site from the light rail stop, including a 6-way intersection. The access proposed in the Draft Master Plan does not encourage easy movement or enhance safety.

A large proportion of future visitors to the racecourse and entertainment precinct will be arriving by light rail and therefore a more direct and legible access is required.

An alternative design has been prepared which proposes to turn the existing rail easement into a new greenway link, connecting directly to a new town square which will expand the proposed Town Square located alongside the light rail station.

This design creates a wide at-grade crossing for pedestrians, provides a more legible street network and improves safety for pedestrians.

The alternative design also proposes to realign the blocks which provides a better design outcome by reducing the number of crossings and creating a more direct route.

This proposal will better connect the Town Square with the entertainment precinct further south (with the opportunity for activated street frontages) whilst maintaining the proposed number of dwellings and open space.

The recommended revised layout incorporates the following:
- the repurposing of the existing rail easement into a new greenway link, linking the ATC site with the Town Square and light rail stop
- a clear line of sight and direct pedestrian link to the racecourse, as a result of the new greenway link leading to the Town Square
- expansion of Town Square provides a substantial increase in public open space in the town centre

The revised street layout and pedestrian access as proposed in the alternative master plan will improve pedestrian access to the ATC site from the light rail stop and better integrate the ATC site with the Town Square.

Recommendation 3
That the revised pedestrian access be incorporated into the Camellia Town Centre Master Plan

Re-defined streets and blocks provide better pedestrian connections within the Town Centre. The large number of patrons visiting Rosehill Gardens need a convenient and pleasant route activated on the edges with retail.
Entry / Identity

It is critical for the function and operation of the racecourse that it has a clear and distinct identity within the town centre and greater area. Racecourse and supporting uses should be visible from Grand Avenue as well as James Ruse Drive to support this identity and provide an appropriate ‘front door’ to the site.

The entry to the racecourse enhances visitor experience and creates an identity for the entertainment precinct. The closure of the T6 Carlingford line and Rosehill station closure will require patrons to instead arrive by light rail, alighting at the Camellia light rail stop. When arriving by vehicle, the ATC proposed road into the site will define a distinctive identity for the racecourse, as well as a direct means of access.

Given the distance of approximately 300m from proposed light rail station to the racecourse entry, and the requirement for a direct and legible route to the racecourse, a clearly visible and identifiable entry is required. This will enhance the entry to the racecourse and provide a sense of arrival for visitors.

Recommendation 4

That the revised entry to the racecourse be incorporated into the Camellia Town Centre Master Plan

A refined street and block layout, public square, convenient pedestrian crossing and simplified 4-way intersection provide a better entry and arrival experience to Rosehill Gardens.
Public open space is critical to the revitalisation of the Camellia Precinct as recognised in the vision of the Camellia Town Centre.

The ATC alternative master plan includes an additional public square to the south-east of the public square proposed in the Draft Master Plan.

The additional public square provides for a greater variety of uses for the Camellia Town Centre by offering greater flexibility for public use and facilitates a new direct pedestrian entry point for the ATC land.

It will also connect to the proposed greenway link, which enhances overall connectivity and visitor experience for the racecourse and entertainment precinct.

The alternative design is co-located with the community facility proposed in the Draft Master Plan.

As a result of the additional public square, the light rail will be transecting open space, creating a shared zone which is pedestrian friendly. This will improve pedestrian access and assist in creating active street frontages from the light rail stop in the retail core down towards the ATC site.

The total approximate open space in the proposed ATC alternative scheme is 11,000m², as indicated on the adjacent diagram.

The recommended alternative master plan incorporates the following features:

- an additional public square to the south-east of the Draft Master Plan square expanding the town centre focus
- the combined space is more flexible than the proposed tiered town square and provides an ideal place for markets as well as a direct pedestrian entry point to ATC land
- a clear line of sight and direct pedestrian link to the racecourse, as a result of the new public square leading to the green space of the rail easement

Recommendation 5

That a new public square linking the light rail stop with the ATC site be incorporated into the Camellia Town Centre Master Plan

A new public square linking the light rail stop to Rosehill Gardens will make crossing the main road into the Town Centre a vastly improved experience for pedestrians. Retail activation of the edges of this square can be provided on ATC land.
We generally support the Draft Master Plan’s vision of a 4-8 storey residential buildings, with residential towers above.

However, we have provided an alternative design that incorporates developable lots which align with landholdings. We do not support built form straddling ownership boundaries as this makes it difficult to implement.

The maximum tower footprint control of 750m² GBA which is intended to manage bulk and scale of development, is not supported. Smaller footprints are considered unfeasible.

A design analysis by Architectus finds that a maximum tower footprint of 1,000m² is ideal. This will allow a 7-8 units per floor plate (depending on the mix). This allows 25% more units sharing lifts, fire stairs and garbage chutes than a 750m² GBA floor plate. This reduces the carbon footprint and provides a more sustainable and affordable outcome.

The objective of slender towers is supported and our experience demonstrates that for towers above 25 storeys, a floorplate of 1,000m² still results in a slender form.

In addition, the built form proposed in the alternative design responds to the flooding constraints and maintains the flooding parcels bound by James Ruse Drive.

Additional retail uses are proposed along the alternative pedestrian route. This will activate the street frontage and contribute to safety and provide vibrancy.

The revised street network and development lots create opportunities for an additional non-residential tower.

The recommended revised layout incorporates the following features:

- an amended blocks for developable lots, outside of the flood storage area, wholly within ATC land, and providing better street and public domain activation.
- an additional non-residential tower permitted on the southern portion of the ATC land enabling the activation of a direct pedestrian route between the light rail stop and the Racecourse entrance.
- adjusted the proposed flood zones to align with ownership boundaries.

Recommendation 6
That the maximum tower footprint control of 750m² be increased to 1000m²

Recommendation 7
That an additional non-residential tower be added to the southern portion of ATC land.

Recommendation 8
That additional retail uses be included along the pedestrian route between the light rail stop and the racecourse entry.

An additional non-residential tower can be added to the area currently containing the Grand Pavilion.

Future flood storage zones on ATC land are required for the whole precinct. The Draft Master Plan indicates that these areas are to be used for private open space.

A refined street and block layout can improve the amount of developable land outside of these flood storage areas within ATC land, and provide better retail edges at ground level and an improved pedestrian experience walking between the light rail stop and leisure & recreation attractions with Rosehill Gardens.
An FSR of 3:1 applies to the ATC land within the Town Centre, which is the lowest identified in the Draft Master Plan. Some parts of ATC land have no FSR (eg. the proposed future transit corridor alignment and the setback from James Ruse Drive).

We believe that with refinements to street, public domain and development lot layout, an improved outcome can be achieved that redistributes additional density closer to the light rail stop. Existing road and rail reservations in public ownership should have no FSR assigned. All future road reservations shown in the master plan that would be dedicated to Council in the future and fall within ATC ownership should have an FSR assigned.

With a revised master plan, greater developable land can be provided within ATC owned land away from the area impacted by flood storage.

We provide the following observations of the DPE Draft Master Plan:

- FSR should align to cadastre boundaries, not a future end-state;
- The existing heavy rail corridor should not have an FSR applied to it;
- The built form envelopes of the proposed Draft Master Plan appears to use an efficiency ratio of 85% from envelope to GFA, 75% is best practice and is recommended, and
- Additional non-residential GFA should be provided on ATC land to allow for additional retail, leisure and recreation uses commensurate with ATC’s vision for Rosehill Gardens Racecourse.

**Recommendation 9**

That additional floor space be allocated to ATC land to reflect its proximity to the light rail stop, and for consistency.

**Recommendation 10**

FSR should be applied to existing cadastre boundaries, not a future end-state (until such time boundaries are adjusted).

**Recommendation 11**

Proposed future land for public dedication (eg. streets, open spaces and the future transit corridor) that is within private ownership should have an FSR assigned.

**Recommendation 12**

That additional non-residential floor space be permitted on ATC land to enable the activation of a more direct pedestrian route between the light rail stop and the racecourse entrance, and to provide for more leisure and entertainment uses.
ATC are generally supportive of the overall Master Plan. However, there are some amendments which will improve the outcomes for both the Town centre and the racecourse and surrounding ATC land to actively contribute to the vibrancy and economic well-being of the Town Centre and Camellia Precinct.

This includes the extension of the boundary south to incorporate a small portion of the racecourse site to enable better integration and connectivity between the light rail stop and the racecourse entry.

The additional portion includes the existing Grand Pavilion on the Racecourse site. The Grand Pavilion may be reutilised for further commercial, retail and entertainment uses.

The amended design improves the street network, pedestrian access, open space and built form as identified in this submission.

Recommendation 13

That the boundary of the Draft Master Plan be amended to include additional ATC land.
Conclusion

The analysis in this submission finds that the Draft Master Plan should be revised to incorporate the changes contained in the alternative Draft Master Plan for the ATC land. In summary, the proposed changes are:

- expand the Town Centre boundary to include more ATC land;
- provide a more legible pedestrian route from the racecourse entry to the light rail stop;
- realign the street layout;
- activate the connection between the light rail stop and the racecourse with ground level retail uses;
- add an additional non-residential tower.

Given the significance of the racecourse to the urban renewal of the Town Centre, it requested that these amendments be incorporated into the Draft Master Plan.

Key Benefits

- Improved pedestrian access to the racecourse to address the Government’s announcement to close the T6 Carlingford Line and Rosehill Train Station.
- Improved pedestrian connections to the proposed light rail.
- Better inter-relationship between the proposed Town Centre and Entertainment Precinct.
- Opportunity for the dedication of public open space.
- More functional street layout.
- Opportunity for additional non-residential uses on the ATC site.

Recommendation 14

That the DP&E amend the Draft Master Plan to incorporate the amendments in the ATC alternative master plan.
Comparison of DP&E and ATC proposed plans

DPE master plan

ATC alternative master plan

ATC site boundary
4 storeys
5 storeys
6 storeys
8 storeys
9 storeys
21 storeys
24 storeys (non-resi)
27 storeys
36 storeys
40 storeys