

4 March 2022

NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

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Dear Sir or Madam,

RE: Draft Camellia-Rosehill Place Strategy

The Urban Development Institute of Australia NSW (UDIA) is the peak industry body representing the leading participants in urban development in NSW. We have around 450 member companies who span all facets of the industry from developers, consultants, local government, and state agencies. UDIA advocates for the creation of Liveable, Affordable and Connected Smart Cities.

UDIA welcomes this opportunity to provide comment on the *Draft Camellia–Rosehill Place Strategy* (the Place Strategy), which has been issued for public exhibition by the NSW Department of Planning and Environment (DPE). This submission builds upon our previous submission on the Place Strategy (October 2021) and has been drafted with input from our Planning and Employment Lands Committees, which include planning and development professionals.

We are keen to see DPE's planning vision achieved for this critical precinct, that forms part of the Greater Parramatta Olympic Park area. UDIA supports the proposal to provide the maximum possible opportunity for sustainable urban renewal with jobs and homes, in an area with good public transport accessibility and service infrastructure.

Now more than ever, Government must deliver on housing supply to reduce ongoing housing affordability concerns in what is a strategically located precinct near Sydney's second CBD. At the same time, DPE must achieve the right land use balance to realise the precinct's employment potential, which could be offered by existing and new uses.

The Camellia–Rosehill precinct (the Precinct) could provide housing supply over 20-year period. Critical to the planning vision is the delivery of Stage 2 of the Parramatta Light Rail (the PLR) by Transport for NSW (TfNSW) to achieve maximum land use integration and the desired 30-minute city outcomes. However, we recognise that TfNSW has not endorsed Stage 2 of the PLR nor has Government committed to the project's funding.

To better achieve the optimum planning outcome for the precinct, UDIA offers the following recommendations, and our submission provides detailed supporting commentary.

- 1) **DPE learns the lessons from other precinct delivery processes that have failed to deliver planning outcomes for growth precincts in Sydney and ensure the proposed PCG includes all government agencies working transparently and being accountable to the community.**
- 2) **Without a Metro station UDIA believes that Government supports Stage 2 of the Parramatta Light Rail based on either the Stage 2B or 2C route options) in order to achieve the 30-minute city objectives.**

- 3) **DPE to protect and enhance employment areas within the Camellia-Rosehill precinct and provide site planning controls that enable modern warehousing.**
- 4) **DPE to provide complete information about how the proposed number of dwellings in the Camellia-Rosehill precinct was decided upon and to work with industry to look at ways of removing constraints such as transport demand to allow increased densities.**
- 5) **DPE to address our previous recommendations, presented in our submission dated October 2021.**

Recommendations and commentary

Our five recommendations will enable the Camellia–Rosehill precinct to emerge as a vibrant mixed-use area with good transport access and high amenity for residents, workers, and visitors.

1. **DPE learns the lessons from other precinct delivery processes that have failed to deliver planning outcomes for growth precincts in Sydney and ensure the proposed PCG includes all government agencies working transparently and being accountable to the community**

Good governance is critical to the efficient and timely development of a renewal precinct, especially when multiple state and local government agencies are involved, who are responsible for both land use regulation and delivery of infrastructure, currently funded under various sources.

UDIA supports the proposal to develop a project control group (PCG) that will oversee the implementation of the Place Strategy, coordinate state agencies and set priorities for the precinct, which has already taken over five years and is still another two years away from development occurring.

However, our experience suggests that on so many occasions, precinct delivery has faltered due to poor coordination and commitment by key state and local government agencies, especially regarding the timely delivery of infrastructure. Already we are seeing TfNSW “working in the back rooms” on the final route for Stage 2 of the PLR without any industry input.

Whilst we support the proposed PCG and planning framework, which will occur under a Ministerial direction, we are concerned that the delivery of the Precinct will suffer a similar fate to that which has occurred with other priority precincts, due to poor coordination. Other issues include a lack of agency commitment, inefficient planning controls and conflicting agency priorities. Some current examples are presented below:

- **Rhodes East** – where several rounds of public exhibitions of a precinct plan has significantly delayed the planning process;
- **Glenfield** – where there is currently no commitment to the upgrade of a regional road, which is now impacting on a Landcom proposal to redevelop a former school site for mixed housing purposes;
- **St Leonards Crows Nest** – where poor planning controls have prevented some development from occurring; and
- **Wentworth Point** – where Government has not committed to the design and delivery of a major peninsular park that was promised in 2013.

UDIA has undertaken an assessment of the key precincts in Sydney and their ability to deliver housing. Our assessment concluded that:

It is clear from the evidence outlined in this report that the precinct planning and urban renewal process in Greater Sydney is a complex, convoluted, slow and inconsistent process. This is leading to multiple iterations of place strategies for a single precinct, unclear priorities, community frustration and a lack of confidence to invest. This is ultimately resulting in a failure to deliver the housing and places that Greater Sydney needs and deserves, at a time when Sydney faces a housing supply and affordability crisis.

DPE must heed the process lessons learned from other precinct processes in Sydney that have failed to deliver short term growth outcomes. This is critical to give industry confidence to invest and commit to projects in the Precinct.

2. Without a Metro station UDIA believes that Government supports Stage 2 of the Parramatta Light Rail based on either the Stage 2B or 2C route options) in order to achieve the 30-minute city objectives

UDIA previously advocated for a metro stop at Camellia-Rosehill which was not endorsed by Government, despite the evidence that it was needed for the long-term growth of the Parramatta CBD. This resulted in a missed opportunity to achieve maximum land use integration in the Precinct with rail access from the Precinct to the City and Parramatta.

Based on a recent Sydney Morning Herald article “Second stage of Parramatta light rail up to 10 years from completion”, it remains unclear when the Stage 2 of the PLR will be delivered.

Without a metro stop, UDIA believes that Stage 2 of the PLR is critical to the development of the Precinct to “Maximise connectivity offered by the Parramatta Light Rail stop in the design and layout of the town centre”. We contend that this can be best achieved through the proposed Stage 2B/2C route options, in order to achieve the 30-minute city objectives.

The Stage 2B/2C routes and light rail stops, as presented in *Figure 4: Integrated master plan*, could allow the Town Centre to be extended along Grand Avenue to create a vibrant precinct that provides easy access between key destinations including shops, schools, open space, and housing. The Stage 2B/2C routes could allow workers in the central part of the precinct better access to public transport.

The proposed Stage 2A route will not achieve maximum land use integration, nor will it achieve the potential for sustainable transport and less private car usage. This route will directly impact on an existing and established industrial precinct (along South Street) and cause major disruption during construction through to final operation. Stage 2A is an inferior route as compared to the Stage 2B/2C routes and will only serve to disrupt an existing employment generating precinct through a prolonged construction stage and resulting disruptions due to road access and existing utilities.

We therefore recommend that Government to support the short-term delivery of Stage 2 of the PLR based on the Stage 2B/2C route options to better achieve the planning vision for the Precinct.

3. DPE to protect and enhance employment areas within the Camellia-Rosehill Precinct and provide site planning controls that enable modern warehousing

UDIA supports the continuation of employment generating uses in the Camellia–Rosehill precinct, which is ideally located to support a large consumer base (Refer to **Figure 1**). The precinct’s strategic location could

support logistics developments and the booming e-commerce market and “last-mile” logistics, which large retailers are increasingly concerned with.

According to a recent SGS economic analysis report, the City of Paramatta Local Government Area only contains 18 hectares of serviced developable land, most of which is within the Camellia-Rosehill precinct. Industrial sites in the Precinct are in high demand and typically only last on the market for a brief period.

We support Action 3 (page 43) which aims to focus on attracting the infrastructure and environment industries in urban services and industrial areas as identified in the *NSW 2040 Economic Blueprint*. To further achieve this, DPE should provide site planning controls in a future DCP that allow for modern warehousing to occur, which typically have heights greater than four storeys and larger floor plates.

Figure 1 – Consumer reach within 45 minutes’ drive



Source: Esri, Michael Bauer Research and Roy Morgan

Source: Goodman

4. DPE to provide complete information about how the proposed number of dwellings in the Camellia-Rosehill precinct was decided upon and to work with industry to look at ways of removing constraints such as transport demand to allow increased densities

The Place Strategy implements a 10,000-dwelling cap in the Precinct; however, it is not clear how this dwelling cap was developed. We assume it is linked to the access capability of the Precinct and a greater justification of the dwelling cap must be presented in the Place Strategy. In this regard, UDIA believes that the dwelling cap could increase if DPE fully commits to Action 1 on Page 48 regarding the proposal to prepare an integrated transport study for the Precinct and *Strategic direction 3 – Improve access and sustainable travel options and choices*.

However, due to their potential urban design impacts, we raise concern with proposed decoupled parking solutions (at grade parking lots / multi-level car parking stations). Decoupled parking could result in a potential loss of employment generating land, as some savvy developers may seek to gain a quick return through automated car parking stations, as opposed to long term employment uses.

Developer advice also suggests that most residents require ease of access to their parking space from their residential unit. This especially applies to older and less mobile residents, where a five-minute walk can be a significant physical task.

Working with industry (through the proposed PCG), could yield a greater range of travel demand measures, which are market-tested, prior to implementation. Alternatively, developer led infrastructure proposals

could also provide an option to deliver integrated transport measures that could support a higher development yield in the Precinct.

5. DPE to address our previous recommendations, presented in our submission dated October 2021

In October 2021, UDIA provided a submission on the *Directions for Camellia-Rosehill Place Strategy*. We are concerned that our previous recommendations have not been addressed and we seek a further response from DPE to those provided again below:

- 1. Implement a true co-design process by which industry and landowners are real partners in the development of the Place Strategy and precinct plan.*
- 2. Investigate the utilisation of digital interactive tools such as an Urban Development Program or the Urban Pinboard already used to model scenarios for Camellia-Rosehill which can support engagement.*
- 3. Support greater transparency in the process, with milestones, timeframes, responsible agencies, status and next steps made publicly available.*

Conclusion

Government must work to increase housing supply in Sydney to respond to ongoing housing affordability and supply issues and resulting socio-economic impacts. Sustained and coordinated housing supply at the Camellia-Rosehill precinct will significantly help achieve the planning vision to provide a mixed use and accessible area offering high amenity, good access to public transport and the jobs the region needs. Paramount to the planning vision for 30-minute cities in Sydney is the delivery of Stage 2 of the Parramatta Light Rail based on route options 2B/2C.

Provided DPE heeds the lessons learned from other precinct processes, industry is confident that the planning vision for the Precinct will be achieved more quickly. The opportunity for industry-led infrastructure and planning outcomes should also be encouraged.

UDIA supports the close engagement of industry to help achieve more sustained travel outcomes, which are market tested, to support a higher yield and the provision of workable planning controls.

Thank you again for the opportunity to make a submission on the Draft Camellia-Rosehill Place strategy. UDIA looks forward to continuing to work with DPE and we seek further engagement to ensure our recommendations have been addressed.

Should you have any further questions or to arrange a meeting, please contact David White, GWS and South Regional Manager on 0415 914 612 or dwhite@udiansw.com.au

Kind Regards,



Steve Mann
Chief Executive
UDIA NSW