



Rosehill Place Strategy

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Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name



Last name



I would like my submission to remain confidential

No

Info

Email



Suburb/Town & Postcode

NEWTOWN

Please provide your view on the project

I am just providing comments

Submission file



Submission

Please find attached my submission.



I agree to the above statement

Yes

[Redacted]

Department of Planning and Environment

[Redacted]

February 16th, 2022

To whom it may concern,

Draft Camellia-Rosehill Place Strategy

I am writing on behalf of the owners of 35 Grand Avenue and 2-8 Thackery Street, Camellia, in response to the draft Camellia-Rosehill Place Strategy. We welcome the opportunity to respond to the many policy directions and initiatives outlined in the Strategy and commend the Department for persisting with the planning and thinking about how this precinct can be revitalised.

We welcome some of the changes made from last years Directions Strategy. In particular, we welcome and commend the Department for considering alternative land uses Zones and planning controls for the eastern portion of the precinct between Grand Avenue and the Parramatta River.



We agree with the draft Strategy that this precinct should not retain its industrial Zone and that the precinct has the potential to support a greater diversity and density of activities and land uses. However, we believe that the Strategy will not achieve the planning outcomes it is seeking with an Urban Services Zone (E3 Productivity Support under the draft Employment Zones Framework) and at the limited density and height increases being foreshadowed.

This sub precinct has many constraints which will need to be overcome before it can be redeveloped. Much of the sub-soil has been contaminated by earlier industrial activities and this contamination should be removed and treated if the precinct is to be sustainably redeveloped. The existing riparian corridor is particularly narrow along this precinct and the existing industrial activities impact poorly on the amenity and environmental health of the Parramatta River. While the Strategy foreshadows widening this Corridor as a Bike and Pedestrian Path, this impacts on the future development potential of the precinct. The Strategy also suggests creating through site links, encouraging a fine grain of development, creation of open space, as well as the possibility of resuming land for the extension of the Light Rail. These constraints are expensive and significantly undermine the economic feasibility of redeveloping this precinct for urban services. Furthermore, the proposed Floor Space ratio (1:1) and a height limit (20 metres) are too low to support the precincts redevelopment. Under the limited land use changes proposed in the Strategy, this sub precinct will remain an underperforming, low employment, industrial area.

We request the Department to consider two alternative planning and land use controls for this sub-precinct which we believe will still deliver the desired urban outcomes the Strategy is seeking to achieve but in an economically viable way.

1. MU Mixed Use

Our preferred option is for this sub precinct to be rezoned to allow a much greater range of activities, including some limited residential development. The higher value residential land use would provide the necessary uplift to support the precincts redevelopment, remediate the contamination and provide for the restoration of the riparian corridor. Moreover, with careful consideration and design, the MU Zone, could also provide most of the other economic uses the Department is seeking for this precinct. Most of the permitted Land Uses in the draft E3 Productivity Zone are compatible with residential development, which is why the draft instrument permits uses such as tourist accommodation, hotels, and motels. Employment uses could be incorporated within the first 20 metres of development, activating the ground plain along Grand Avenue and providing the employment and services the Strategy is seeking to attract, with residential uses above. A Mixed-Use Zone, which caps residential use to a maximum of 50% of new development, is now not uncommon in NSW. If the Department is concerned about strata sub-division preventing future growth or change in this precinct, this can be addressed by restricting residential development to the new housing formats proposed by the Housing SEPP - Build-to-Rent and Co-living.

The stated need to create a buffer or 'transition area' between the new Mixed-Use precinct (the front door) in the west and the heavy industry (the back door) in the South is sound for most of the Camellia but makes no sense for the sub- precinct on the northern side of Grand Avenue. There are no industrial uses north or east of this sub-precinct from which future residents need to be protected. Designating this area as a 'transition area,' will only provide a buffer separating future residents from some 800 metres of foreshore and mangrove forests, the Parramatta River, and the future wetlands.

While there are heavy industrial activities to the south, Grand Avenue can provide a suitable buffer to protect future residents. This road is already some 30 metres wide and a further

20 metres along the southern side is now in Government ownership. With suitable plantings, setbacks and urban design, this 50-metre-wide piece of public land could easily provide the buffer and transition the Strategy is seeking to achieve.

The introduction of a Mixed-Use Zone along the entire northern side of Grand Avenue will:

- not preclude this area generating significant employment.
- capitalise on the improved connectivity of the Light Rail extension.
- drive the remediation of contaminated land and restore the riparian corridor.
- make a greater contribution to the wider infrastructure needs of the Camellia.
- provide much needed new housing while adding activation and supporting a night-time economy.

2. Greater density, height, and flexibility, while retaining the E3 Productivity Support Zone.

While a Mixed-Use Zone is our preferred option, an alternative could be to adopt the land use controls being applied to similar Urban Services precincts in other parts of Sydney.

In the economic report accompanying the strategy, SGS Economics and Planning argue that the proposed 'transition area' could function in a similar way to the North Alexandria precinct in Sydney City. This precinct provides significant employment while also providing a buffer between the high-density neighbourhoods of Green Square and the southern industrial lands, port, and airport. Their report even uses Alexandria as a benchmark to determine the development feasibility of Camellia.

We agree. Both precincts have good connectivity to a nearby CBD's, a variety of lot sizes, and ready access to a local workforce. However, while we agree with their assessment we do so only if the land use controls which apply in Alexandria are applied in the 'transition areas' of Camellia.

Under the draft Camellia Strategy this transition area will have:

- A maximum height of 20 metres.
- A floor space ration of 1:1.
- An as yet underdetermined, range of permissible and prohibited activities.

The transition area in Alexandria has:

- A maximum height ranging from 35 metres to 60 metres.
- A floor space ratio ranging from 2.5:1 to 3.5:1.
- An extremely broad range of permissible activities and with only a few prohibitions.

The Strategy has high aspirations for Camellia as an economic powerhouse generating some 14,500 new jobs, over half of which (some 7500) are to be located in the 'transition area'. This won't happen with the very restrictive planning controls proposed in the Strategy. It will not be economically viable to redevelop these lands, and they will remain heavy industry.

Greater protection of existing use rights:

The draft Strategy rightly suggests that land use changes will be gradual and that many existing activities and enterprises will continue to operate under their existing use rights for many years to come. Likewise, many landowners will not wish to pursue the opportunities and changes proposed in the draft, deeming them economically unviable or not suitable to their personal circumstances.

However, in recent years the protections for existing use rights in NSW have been significantly weakened. A change of tenancy, a variation to a consent, or a minor change in activity or use, can extinguish an existing use, making certain activities, such as industrial, prohibited. While the Strategy flags that the Department will investigate “special provisions” to bolster the protection of existing uses for companies like Boral, Veolia and Concrete Recyclers, this protection should also be extended to protect landowners. Over time, many of the existing businesses will relocate elsewhere and it is important that their existing use rights can be taken up by new tenants. Many landowners in the transition area may find their property sterilised, unable to be redeveloped under the proposed Zone and unable to secure industrial tenants.

A need for greater flexibility and review in the Strategy:

In responding to the Strategy, we have raised issue directly related to my client’s property and made suggestions on how the Strategy might be improved. However, we are also requesting the Department to keep an open mind about how the aspirations for Camellia can be achieved and to consider some of the suggestions we are making before proceeding to the next stage in the process. This is a 20-year plan and if it is to be successful it should be adaptable and the subject of active revision and amendment as circumstances change, and new opportunities emerge. This should not be a one-off, set and forget, Strategy.

In coming months, the EIS for the Light Rail extension will be finalised and there is a real possibility the preferred route will traverse the length of Camellia. This should prompt further changes in land use and density and the Strategy should be changed to reflect this.

Likewise, the Covid pandemic has driven significant change in the way businesses operate, how supply chains work, and where and how our citizens work, consume, play, and live. These changes have exposed many deficiencies in our planning and land use controls which have proven inflexible, outdated, and overly prescriptive. As far as practical, the Department should adopt a flexible suite of land use controls which allows the Precinct to evolve and adapt over time.

While not mentioned in the Strategy or supporting documents, the option of applying a SP4-Local Enterprise Zone across this precinct could provide the flexibility needed to support growth and change. Using this Zone would enable a bespoke land use table, better suited to achieving the aspirations of the Strategy, while also protecting existing activities. It would also allow for any land use conflicts to be resolved at the DA stage and not through prescriptive, slow, and cumbersome, strategic planning.

Conclusion:

We reiterate our thanks for the opportunity to comment on the draft Strategy and look forward to hearing further of the Departments deliberations and response to some of our suggested amendments. We would welcome being kept informed of the next steps in the planning process and are happy to clarify any of these amendments and suggestions we have made in this submission.

Yours Sincerely

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