



Subject:



Webform submission from: Draft Camellia-Rosehill Place Strategy



Submitted on Fri, 04/03/2022 - 15:05

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

Sydney

Please provide your view on the project

I support it

Submission file



Submission

Please see attached submission.

I agree to the above statement

Yes

[REDACTED]

4 March 2022

[REDACTED]
Secretary
Department of Planning and Environment
Via Online Portal Lodgement

Dear [REDACTED]

SUBMISSION | DRAFT CAMELLIA-ROSEHILL PLACE STRATEGY

This submission has been prepared by [REDACTED] on behalf of the [REDACTED]. The [REDACTED] thanks the Department of Planning and Environmental (DPE) for the opportunity to comment on the Draft Camellia-Rosehill Place Strategy (the Draft Strategy).

The [REDACTED] are supportive of the Government preparing a new Place Strategy for Camellia-Rosehill Precinct, an important strategic location less than 2km from Parramatta central business district (CBD). The [REDACTED] is well aware of the precinct's importance and supports the significant opportunity in Camellia-Rosehill to create a clean, green and sustainable place for the community to live and work, now and into the future.

More specifically, the [REDACTED] are largely supportive of the proposed changes to land use zoning and built form controls. The focus of this submission is on the timing for implementation of the proposed changes, who will be responsible for this process, staging and ensuring that the reliance on [REDACTED] land to deliver social infrastructure/public open space is feasible and enables additional yield, mixed use development and/or developer contribution offsets on the [REDACTED] land. The [REDACTED]'s eagerness to get underway with redevelopment of Rosehill Gardens Racecourse remains, given the [REDACTED] land is strategically located as the gateway to the Precinct. This, along with several other key considerations will be discussed further in this submission.

ABOUT THE [REDACTED]

The [REDACTED] is a not-for-profit organisation with all income reinvested for the benefit of its members and the thoroughbred racing industry. The [REDACTED] owns and operates several racecourses, thoroughbred racing events, training and stabling facilities across NSW. As you would be aware, the [REDACTED] are the owners and operators of Rosehill Racecourse (also known as Rosehill Gardens Racecourse) with an extensive history within Australia's racing culture for over 130 years.

Rosehill Racecourse is considered one of Western Sydney's premier entertainment spots and a major thoroughbred racing venue in Australia. The Racecourse also offers 34 unique venues for non-race day events, making the site the largest function and conference centre in Western Sydney. These events include corporate events, trade shows, entertainment, and community events and overall, the site provides a significant contribution to the State economy.

[REDACTED]



Rosehill Racecourse site is made up of the racetrack proper, training tracks within the infield, the Rosehill Gardens Grandstand, admin and operational buildings. The Racecourse also provides stabling facilities with over 400 stalls in the south western corner of the site fronting Unwin Street and provides at-grade car parking along its western boundary fronting James Ruse Drive. The car parking is currently separated by the at-grade T6 Carlingford line and Rosehill Train Station, which has been decommissioned and under investigation by Transport for NSW.

Figure 1 Rosehill Gardens Racecourse Site (As subject to the Draft Strategy)



Source: DPE

The [redacted] owns additional lands in proximity to the Racecourse, including the Rosehill Bowling Club on the corner of James Ruse Drive and Hassall Street, and relevant to the Draft Strategy for Camellia-Rosehill Precinct, land to the north of the Racecourse between Grand Avenue.

The [redacted] therefore have significant interest in the Draft Strategy and are committed to working with key stakeholders in the area, Parramatta Council, and the NSW State Government to deliver a high-quality master planned outcome for the Rosehill Gardens Racecourse. This will not only deliver additional jobs, housing and potential open space and social infrastructure for the community but will more importantly reinvigorate the racecourse through establishing a prominent arrival experience and front door to the precinct.





1. THE DRAFT CAMELLIA-ROSEHILL PLACE STRATEGY

1.1. SUMMARY

Camellia-Rosehill has an important strategic role as an industry and employment hub within the Greater Parramatta and Olympic Peninsula (GPOP) Economic Corridor. As outlined in the Draft Strategy, it is intended that by 2041, the precinct will be enhanced with service and circular economy industries and new recreational and entertainment facilities, all enabled by better transport access via light rail, active transport and road connections. A well-designed town centre next to the light rail stop will be the focus of community activity. New homes will be close to public transport, supported by walking and cycling paths and new public spaces, including the Parramatta River foreshore.

Using a master planning approach, the Draft Strategy establishes 5 strategic directions, each with related principles and actions. The Masterplan sets a land use framework for future development across a series of sub-precincts with an associated infrastructure plan and design criteria. Importantly and forming a key pillar of Strategy 2, is the intent to create a new town centre with associated residential development which capitalises on the Rosehill Garden Racecourse to create a new entertainment precinct. It is hoped that through this new town centre, the Rosehill Gardens Racecourse will integrate and support new restaurants, bars, cafes, and other entertainment venues to provide a vibrant night-time economy serving the precinct and broader Central River City.

As DPE is aware, there has been direct engagement already undertaken with stakeholders and landowners in the first phase of the place strategy, as well as during Directions Paper exhibited during the second half of 2021. The [REDACTED] would again like to take this opportunity to build upon the existing engagement and requests ongoing direct dialogue with the DPE team and their appointed key planning and design consultants. This engagement is critical to realising numerous key objectives of the Draft Strategy, particularly those which relate to the use of ATC land for future development and social infrastructure.

1.2. [REDACTED] LAND

The Draft Strategy identifies the Rosehill Gardens racecourse as being an important entertainment venue within Western Sydney, with around 25 race meetings a year. Between major race events, the Racecourse serves as a function space that is rented out by organisations and individuals for conferences, exhibitions, trade shows, celebrations, and weddings. It also provides a buffer between residential areas west of James Ruse Drive and industrial land uses to the east.

The Draft Strategy identifies the following key precinct considerations as applying to the Rosehill Gardens Racetrack site:

- *Allow for some mixed use development, including residential, in the north-western quadrant of the Precinct, concentrated around the future Western Sydney Light Rail alignments and with primary access from James Ruse Drive and Grand Avenue*
- *Create an industry-leading entertainment precinct at Rosehill Racecourse, which also serves as a buffer between the mixed use and industrial uses within the Precinct*
- *Investigate opportunities for additional public facilities and infrastructure to support the expected demand for services at Camellia.*

Specifically, land between the Rosehill Gardens Racecourse and James Ruse Drive will be developed as a mixed-use entertainment precinct, providing the City of Parramatta and surrounding areas with an

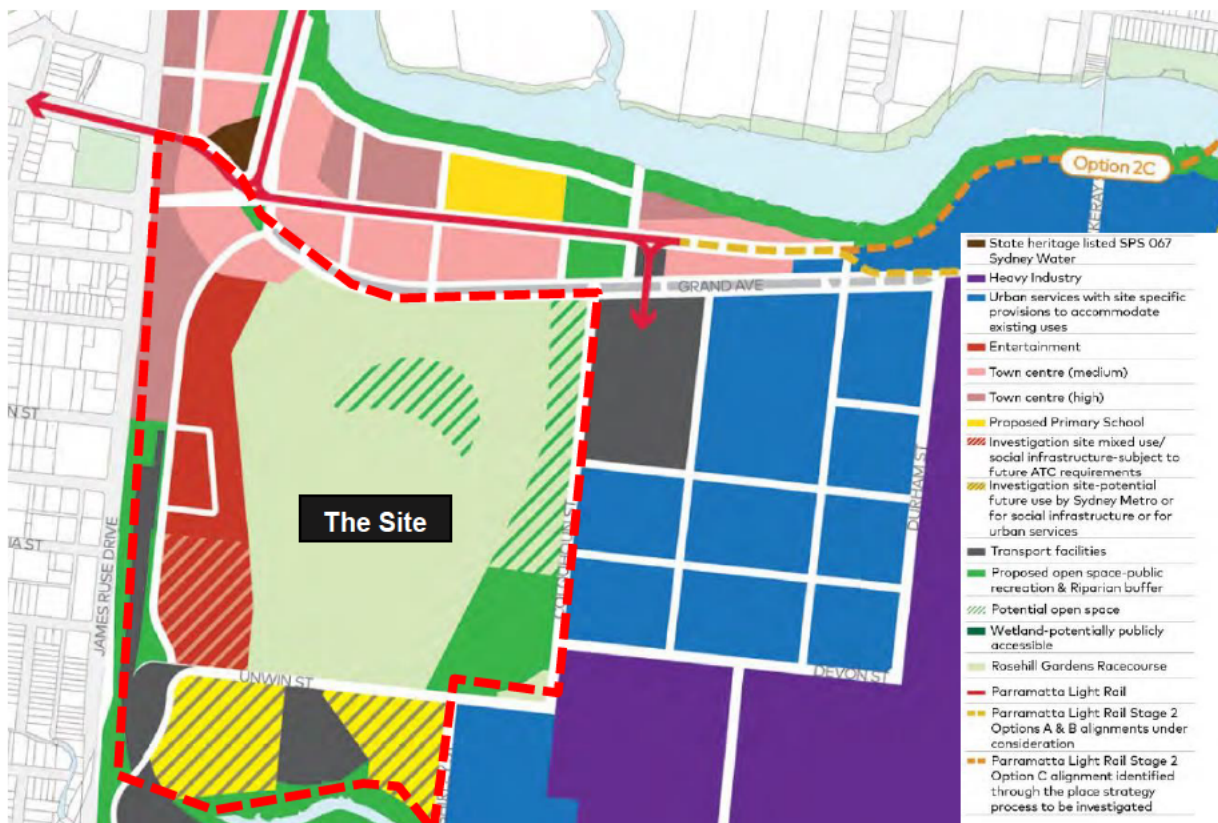


18-hour economy destination, including restaurants and small bars, venues for entertainment, live music, arts and culture, as well as special events which will continue to utilise the racecourse.

Figure 2 shows the proposed masterplan designation map which identifies land zoning applicable to ATC land, with the following 'zonings':

- Town Centre (medium)
- Town Centre (high)
- Entertainment
- Investigation site mixed use/social infrastructure subject to future ATC requirements
- Proposed open space-public recreation
- Potential open space (in the racetrack)

Figure 2 Proposed land uses



Source: DPE

The purpose of the Town Centre Present (both medium and high), is for new homes, jobs, shops, cafes, restaurants, entertainment, and local services. It will be located close to transport connections in an attractive place for people to live, work and visit. There will be a focus on housing choice, creating a diverse range of uses and 24-hour activity. The town centre and entertainment sub-precinct is anticipated to include a cap of 10,000 dwellings.



The proposed changes to land zoning and development standards are outlined in Table 1 below. The proposed land-use zones are based on Parramatta Local Environmental Plan 2011 (PLEP 2011), the department's Standard Instrument, being the Principal Local Environmental Plan (2006 EPI 155a), and the employment zones reform transitional zones.

Table 1 Proposed land-use zoning and development standards

Land uses	Zoning	Maximum building height (metres)	Maximum FSR
Town Centre (Medium)	MU1 Mixed Use (B4 Mixed Use Under PLEP2011)	80	4.5:1
Town Centre (High)	MU1 Mixed Use (B4 Mixed Use Under PLEP2011)	130	5.5:1
Entertainment	Retain its current RE2 Private Recreation zoning or SP3 Tourist	36	4:1
Racecourse Gardens Racecourse	Retain its current RE2 Private Recreation zoning under PLEP 2011 or SP3 Tourist and Visitor Accommodation	N/A	N/A

Whilst the [REDACTED] are supportive of the Town Centre (High) designation and proposed MU1 Zone, it is recommended that:

- The land proposed to be Town Centre Medium be designated Town Centre (High). This is based upon an analysis of the site's uniqueness, which is not environmentally constrained in the same way as the broader Camellia Precinct. Previously undertaken high-level master planning for the site has shown that this part of Rosehill Racecourse site is highly suitable for higher density redevelopment based on the following:
 - The site is not subject to the same degree of environmental affectations that a large majority of the precinct are, such as flooding and contamination.
 - This portion of land is immediately adjacent to the Parramatta Light Rail and future Metro alignment. This will enable future workers and residents to rely on high frequency public transport which will in turn reduce car dependency.
- Any reliance on the [REDACTED] land for open space and social infrastructure should be appropriately offset with greater density/yield, residential permitted in the entrainment precinct and appropriate offsets to developer contributions. Any such infrastructure could not impact on any essential course proper or track operational requirements.
- The proposed 'Entertainment' Precinct portion of the Rosehill Gardens Racetrack should be rezoned to a mixed use zone, including residential. This will enable a greater mix of land uses to be facilitated, enabling the 18 hour precinct as envisaged by the Draft Strategy.



- The desirable zoning for the Rosehill Gardens Racecourse is to retain its RE2 Private Recreation zoning, noting all uses associated with the ongoing operation of the Racetrack are captured as being permitted with consent. Should the DPE move to introduce the new zoning of SP3, uses proposed to be permissible should at a minimum cover those currently permissible, while looking for additional opportunities for a greater mix of uses to be introduced.

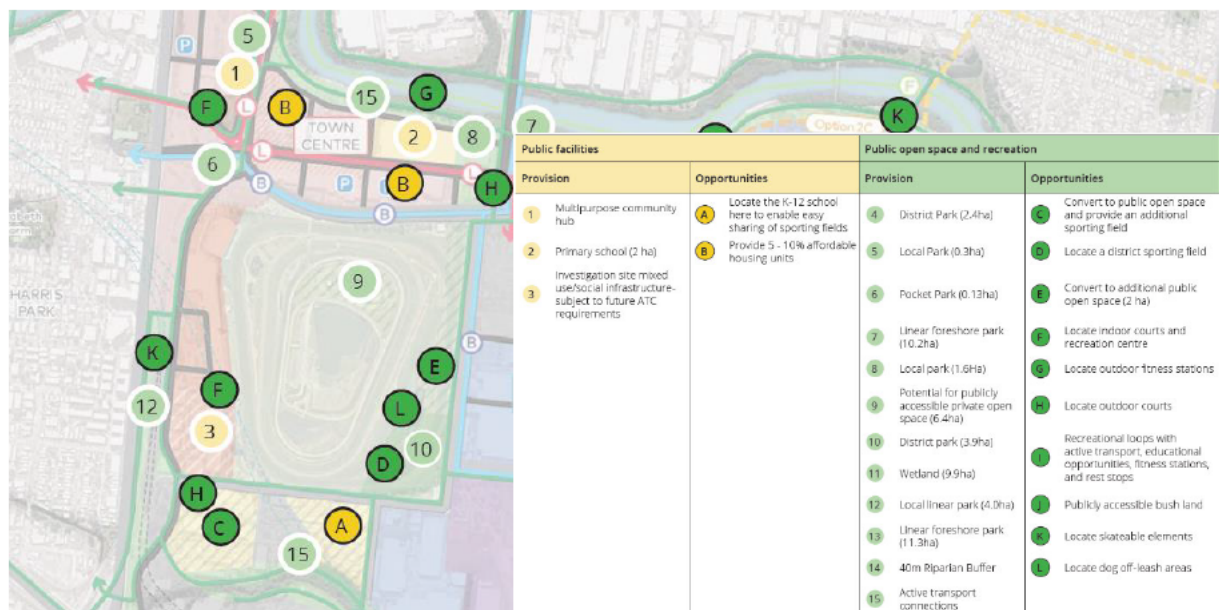
2. KEY CONSIDERATIONS

2.1. INFRASTRUCTURE DELIVERY / FUNDING

The Social Infrastructure Implementation Report has identified a significant undersupply of social infrastructure within the LGA. The report recommends strategies for the provision of several types of social infrastructure within the Camellia suburb and Camellia Town Centre, including the delivery of a 5,000 sqm of indoor recreation spaces, 1-2 full size sportsgrounds, build a new district park, a new district play space, a new library of 1,800 sqm, a community hub of 1,700 sqm, and a function centre of 500 sqm. However, the CIS states that these are indicative and are subject to change based on any changes to land use planning or new opportunities that arise in particular locations.

As noted in the report, most of the precincts open space is privately owned and operated, namely that of the Rosehill Gardens Racecourse. This indicates opportunities for partnership with private recreational spaces to make them multi-use spaces that also provide publicly accessible open space for the residents of the Precinct. As shown in Figure 3, the report proposes social infrastructure items to be located on [redacted] land, including a southern district park which could act to also provide a K-12 school, and a variety of linear and pocket parks.

Figure 3 Preferred scenario social infrastructure provision and recommendations



Source: Cred Consulting



Figure 4 Indicative



Source: DPE

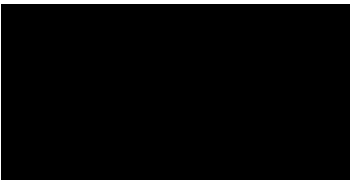
As is discussed in the Infrastructure Delivery Plan, key sites are proposed to deliver specific infrastructure required to support the growth of the precinct. Key sites' planning provisions are provisions included in an environmental planning instrument such as a LEP that allow developers of key sites to deliver infrastructure such as works in-kind, or via land dedication, in exchange for approval to develop the land for alternative use or, at a greater intensity, or both. It is not clear whether this would enable further uplift to be achieved on sites, or simply provide for offsets in development contributions.

As has been noted in past submissions made by the [REDACTED] and acknowledged by the DPE in the Draft Strategy, the scale and rate of development density and associated infrastructure demands over the last decade has brought demands for infrastructure and services beyond that which are currently provided in the Camellia to Rosehill Precinct. Despite State Government led investment such as the Parramatta Light rail, there is already an infrastructure deficit.

The Rosehill Gardens Racetrack site is identified as being suitable to provide active recreation (land and works), and a combined primary and high school. This places a large burden on the [REDACTED] and their land. Regardless of the strategy for the delivery, such burden needs to be offset by increased yield, flexible mixed use zoning for larger portions of the site (such as the entertainment precinct), and developer contribution offsets. Importantly, while it is acknowledged the Draft Strategy is conceptual only, consideration of the functionality of [REDACTED] land needs to be considered. Placing a K-12 school for example immediately adjacent to the racecourse proper will result in numerous issues.

The infrastructure plan notes that the potential of the key sites' mechanism is dependent on the developer of each key site being able to absorb the cost of the infrastructure while still achieving a profitable development. Concern however is raised at the statement in the plan, which states, "The feasibility of the linked infrastructure items and the development potential of key sites has not been tested, and so the anticipated \$370 million return from the key sites mechanism should be treated with





caution. Feasibility testing needs to be undertaken before deciding on key sites and their required infrastructure.”

Other than riparian buffers, the predominant areas of land designated for open space and public recreation sit within [REDACTED] land. While the [REDACTED] are welcoming of the opportunity to diversify their land holding, they are cognisant of the need to balance expectations with proposed growth.

The burden placed on [REDACTED] land is significant and has yet to be discussed with the [REDACTED] in detail. The [REDACTED] request that dialogue regarding feasibility assessments undertaken to offset potential social infrastructure commences to ensure an equitable outcome is reached.

2.2. ECONOMIC ANALYSIS

The economic analysis accompanying the Draft Strategy on exhibition highlights the desirability of locating housing in certain areas within the precinct close to amenities such as the river foreshore and public transport. This is highlighted as being important as it offers a funding source for other critical infrastructure that can benefit all land uses in the precinct, such as improvements to the precinct's accessibility. However, the report notes that any funding received from residential development will also need to be allocated towards population serving community infrastructure given there is no current provision of it in the precinct.

As has been discussed above, should [REDACTED] land be burdened with the expectation of enabling significant social infrastructure, then consideration should also be given to the fact that [REDACTED] land is the least burdened, and located not appropriately in relation to high frequency public transport (current and proposed). The logical development of the precinct should commence with land with the least economic constraints placed on redevelopment, such as access, land contamination and flooding.

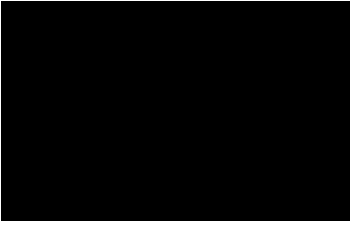
As such, the [REDACTED] support the staged delivery of the precinct to contribute towards new dwellings, job creation, and a thriving town centre with 18 hour economy. The timing of the associated stages relevant to economic constraints should be refined to enable redevelopment of [REDACTED] land earlier in the process.

2.3. CONTAMINATION & PARKING

As was flagged during the Draft Camellia Town Centre Master Plan (2018), extensive capping was proposed in the town centre to address contamination and flooding issues. The proposal included the exclusion of basement parking from developments. It was instead proposed that car parking be provided above ground in the building podiums.

As part of the ongoing development of the supporting studies accompanying the Draft Strategy, it is again proposed that the Precinct Remediation Strategy should generally preclude basement levels for car parking. The intent here is to ensure minimal disturbance of contaminated soil and to minimise generation of waste fill/soil requiring on/off site management and to minimise requirements for ongoing management (e.g. contaminated groundwater and/or hazardous ground gases in basements). This approach is also aligned with the proposal to investigate opportunities for precinct based adaptable car parking and infrastructure in lieu of private provision of car parking.

While the [REDACTED] generally support strategies to minimise the environmental impact of developments, precinct wide blanket approaches to matters such as contamination may be a deterrent to feasible redevelopments which provide for desirable urban design outcomes. Particularly on site that are not inhibited by contamination issues.



The [REDACTED] request that flexibility be applied to enable site by site assessment of the suitability of basement parking.


2.4. TRAFFIC AND TRANSPORT

The Traffic and Transport Technical Implementation Report which accompanies the Draft Strategy has been driven by principles outlined in strategic planning strategies relevant to NSW and the Central River City, as follows

- *Providing the right mix of homes, jobs and recreation within close proximity to enable shorter trips made by walking cycling and public transport.*
- *Focused investment in improved public transport routes to, from and through the precinct, such as the new Parramatta Light Rail and local bus services.*
- *Maximise connectivity offered by the Parramatta Light Rail stop in the design and layout of the town centre.*
- *Safer and more reliable road connections to and from the M4 and State Road network to service existing and future industrial and employment uses.*
- *Safe and high-quality street environment within the precinct to encourage people to walk and ride bicycles, as well as enable great place outcomes.*
- *Appropriate provision and location of parking and urban freight access to enable vibrant places and encourage sustainable travel choices.*


While no strategic modelling or detailed microscopic modelling has yet been performed for the master plan, outputs from the Strategic Travel Model have been incorporated into the preliminary analysis of the future Precinct trip generation and distribution. The following key traffic outcomes been derived from the travel model outputs:

- The Precinct is located on the corner of James Ruse Drive and the M4 Motorway/ Parramatta Road, providing it with good access to the broader Sydney arterial and motorway road network. Travel patterns in the Camellia-Rosehill Precinct are currently dominated by private vehicle usage. Public and active transport networks are limited due to the current industrial and low-density land uses resulting in low demand for these transport provisions. Direct access into the Rosehill Gardens Racecourse car park is also possible from James Ruse Drive. Deniehy Street provides access to a small, isolated section of light industry east of Valvoline Raceway.
- These two access points are located near the Precinct's western edge, severely limiting movement to the north, east and southern directions. This is primarily due to the Precinct's location on the banks of the Parramatta and Duck Rivers, meaning any new connections would need to include new bridges over these waterways.
- Traffic volume counts of vehicles entering or exiting the Precinct at the two access points averages at around 19,300 per weekday. Two-thirds of this traffic uses Grand Avenue, with the remaining using Wentworth Street. Traffic during the weekends is less than half of average weekday traffic.
- A capacity assessment was carried out for key road links around the Precinct. The assessment indicates that the demand observed on James Ruse Drive, Victoria Road, Parramatta Road, and Silverwater Road are expected to exceed the design capacity in at least one of the peak hours, which would result in poor intersection performance and long delays for vehicles travelling on



these roads. An increase in turning volumes into the Precinct as a result of land use changes may potentially exacerbate existing traffic performance issues.

- The new north-south road located to the west of Rosehill Racecourse and connecting to Grand Avenue will function as a vibrant civic space, providing access the new entertainment district. Supported by the new light rail connectivity, this street will form the core of the Precinct's evening economy and provide recreational value to both residents and visitors alike. High pedestrian activity and slow traffic movements are expected along this street.

These findings further identify the need to locate higher density development immediately adjacent to high frequency public transport, such as the northern portion of  land currently identified as Town Centre (medium). Given the expected delivery of the Parramatta Light Rail, redevelopment in this portion of the precinct can occur now, enabling new development to capitalise on such infrastructure immediately. This will reduce car dependency while capitalising on the significant investment made by the State government on new public transport.

Sydney Metro West – Clyde stabling and maintenance facility

The Clyde stabling and maintenance facility (MSF) site is planned to the southwest end of the Camellia-Rosehill Precinct, bounded by Unwin Street, James Ruse Drive, and the M4 Motorway (refer Figure 5). The facility will include a dive site for the metro line expanding to the north of the site, adjacent to Prospect Street. The proposed realignment of Unwin Street to join Wentworth Street is currently under planning by Sydney Metro and will likely provide access to the MSF site.



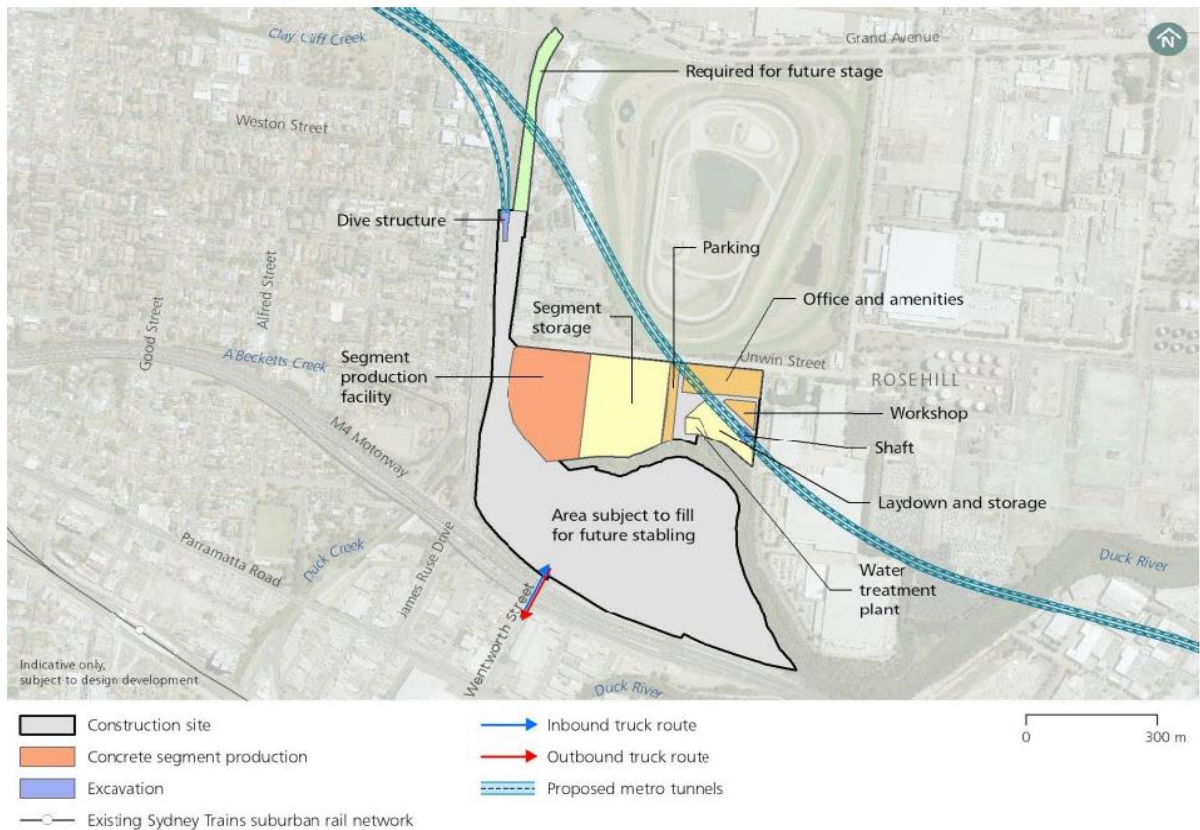




Figure 5 Clyde stabling and maintenance facility construction site



Source: Sydney Metro West EIS Tech Paper 5 – Landscape and visual

The existing heavy rail on site is proposed to be decommissioned and is under investigation by Transport for NSW. The proposed future Place Strategy will not deliver optimal place making outcomes if the current heavy rail easement is not removed/ relocated. [REDACTED] are keen to understand if Sydney Metro and the DPIE will have a coordinated approach to the issue of the heavy rail corridor, particularly given its impact on the potential redevelopment of the site. Urgent coordination is required with TfNSW, Sydney Metro to achieve positive urban design outcome for [REDACTED]. It is recommended that DPIE facilitate this opportunity, so that the revised corridor through the [REDACTED] land can be jointly designed with input from TfNSW as part of future site wide master planning

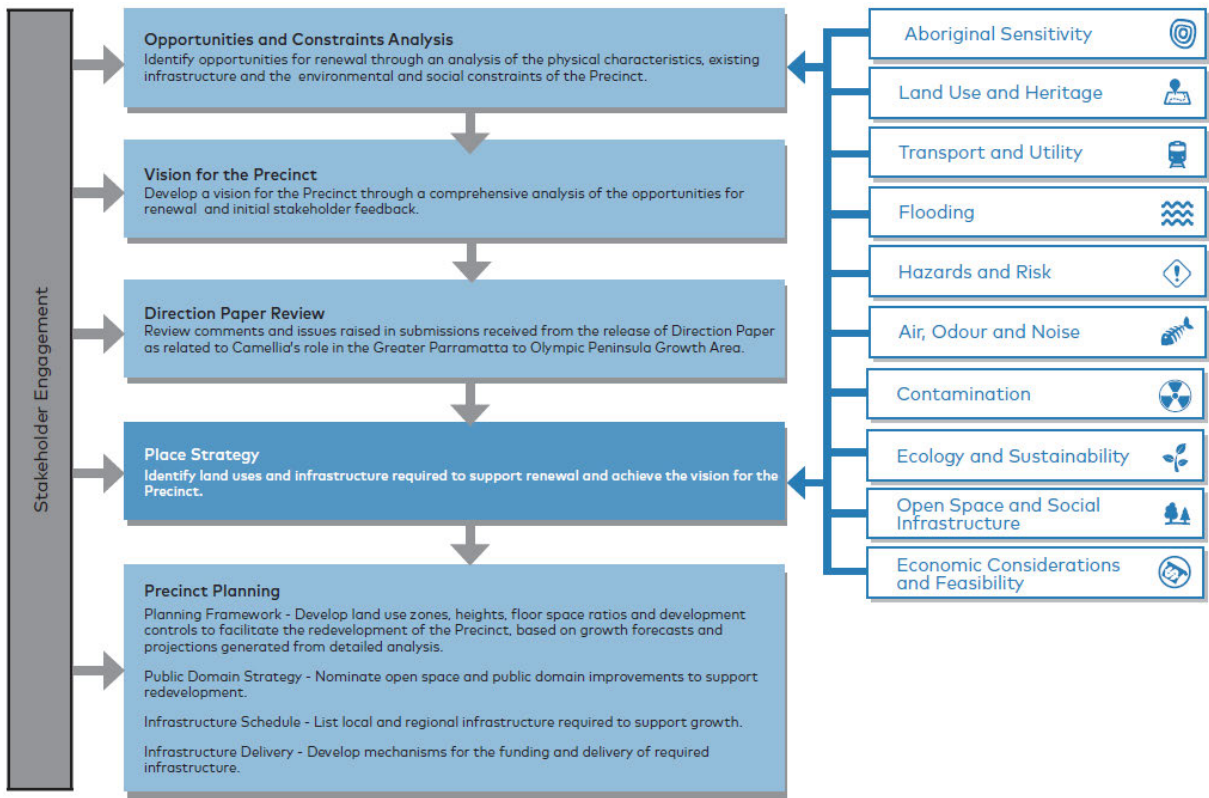
Urgent coordination is required with TfNSW, Sydney Metro and [REDACTED] to achieve clarity on the intent of the heavy rail corridor. DPE need to facilitate these discussions so that the corridor can be jointly designed and appropriately incorporated into the future site wide master plan.

2.5. THE MASTER PLANNING PROCESS & TIMING

The master plan process for the Camellia-Rosehill Precinct as taken from the Draft Strategy is outlined in Figure 6 below. To facilitate certainty for future redevelopment potential within the precinct, namely that of [REDACTED] land, concern is raised over proposed need to still develop land use zones, heights, floor space ratios and controls as part of more detailed precinct planning.



Figure 6 Master Planning Process Flow Chat



Source: DPE

While it is acknowledged the amendments proposed under the Draft Strategy are conceptual, commitments need to start being made by the DPE on how the broader precinct will look. Uncertainty around the future of the Camellia to Rosehill Precinct has now extended for many years, which has resulted in stalled attempts to revitalise the precinct. If the DPE are actively looking to achieve an outcome within the precinct, decisions need to be made and master planning progressed to enable staged redevelopment of suitable land.

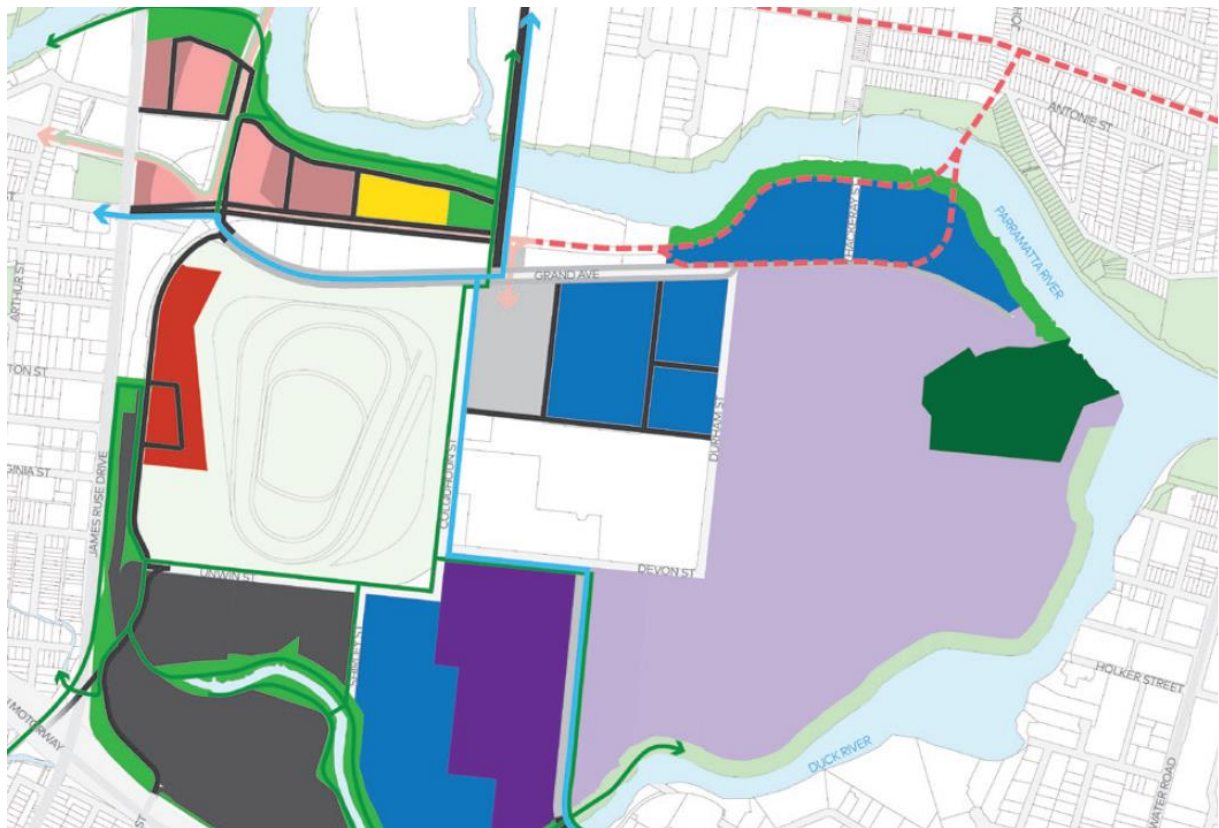
The [redacted] stresses that the north west and western portion of Rosehill Gardens Racecourse fronting James Ruse Drive has site-specific merit to justify master planning for mixed-use redevelopment in the short term which also includes residential across the entire portion of this part of the site. This site acts as a Gateway site for the broader precinct and is therefore the logical inclusion for the early stages of the precinct's redevelopment. Residential and mixed use development (including entertainment uses) can occur immediately, without the need for lengthy and costly delays relating to flooding and contamination, which will act as a catalyst for redevelopment of the broader area.

Proposed open space requires discussions with the [redacted] before being incorporated into and relied upon by the Draft Strategy. As has been discussed above, the proposed layout does not align with the operational requirements of [redacted] land, and this will need to be further investigated. Further, the [redacted] supports the potential mixed use investigation area which would require the relocation of horse stabling areas, however, appreciates this is a long term goal and will require careful coordination with the [redacted] operational obligations.





Figure 7 Medium term - 5 to 10 years



Source: DPE

The [redacted] again stress the suitability of their land for development in the short to medium term, noting the site is not subject to the same degree of affectations such as contamination as other sites. This will undeniably act as a catalyst for broader redevelopment of the precinct and will contribute to the infrastructure requirements of the precinct (through possible physical delivery of social infrastructure, and through likely development contributions). Aspirational staging should be cognisant of logical redevelopment opportunities.

2.6. IDENTIFIED CONSTRAINTS

A Hazard Risk Report prepared by Sherpa Consulting supports the exhibition package. The report notes that the draft master plan has been developed incorporating constraints imposed by:

- Viva Energy's Clyde and Parramatta Terminals.
- Ampol's fuel pipeline that runs under Grand Avenue and then north adjacent to the light rail alignment.
- Secondary main gas pipelines, which although not generally posing constraints run in the same easement as Ampol's pipeline and if they leak, they may lead to a larger, escalated fire.



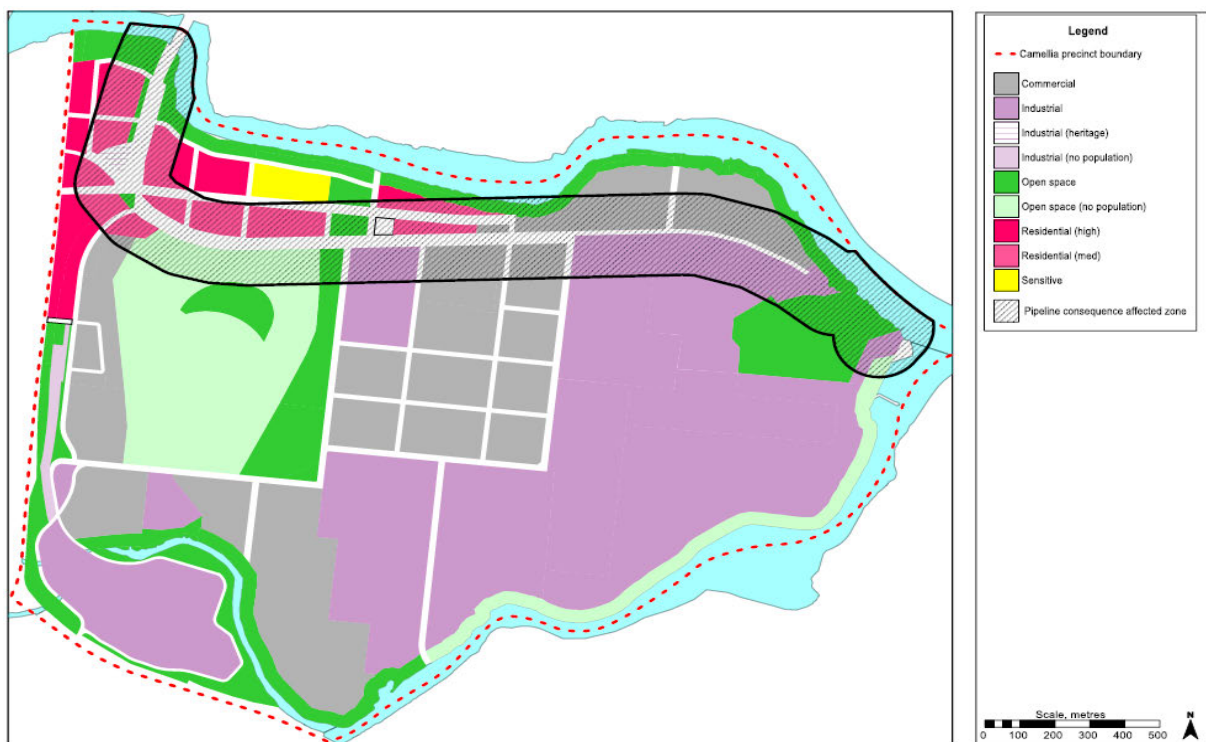


Developments proposed with 'sensitive' uses, such as child care centres, hospitals and aged care facilities in the consequence affected zone shown in Figure 8 need to be referred to DPE's hazards assessment team for comment to ensure that they comply with the qualitative risk criteria.

As noted in the report, the population used to define the draft master plan has been derived from finalised population figures, and therefore further population intensification would not meet the risk criteria. The consent authority must therefore consult DPIE (hazards) if a development is proposed with a population greater than that allowable for any location, particularly those defined as Town Centre (medium) in the draft master plan prior to submission of a Preliminary Hazard Analysis. A review of land use safety considerations will be required.

The affected zone as identified in Figure 8 below captures a large portion of land which is to be zoned as Town Centre (high and medium), specifically that of residential. This zone influences [redacted] owned land in the north.

Figure 8 Consequence zone map



Source: Sherpa Consulting

The [redacted] request reconsideration of the zoning of land which falls within the 'pipeline consequence affected zone'. The proposed zoning appears to locate only Town Centre (medium) within the affected zone. As has been raised above however, to offset potential social infrastructure obligations of [redacted] land, these zones need to provide for Town Centre (High), allowing higher density development closer to key public transport nodes.





2.7. FLEXIBLE PLANNING CONTROLS



Camellia–Rosehill master plan includes 3 sub-precincts that have been defined through a collaborative design process. A new town centre located to the north-west and western edge of the precinct will serve as a hub for community activity. It will capitalise on the Parramatta Light Rail Stage 1 and Stage 2 and improved access to James Ruse Drive. New homes, jobs, shops, cafes, restaurants, entertainment and local services will be located close to transport connections in an attractive place for people to live, work and visit. There will be a focus on housing choice, creating a diverse range of uses and 24-hour activity.


High-density residential uses will be supported by novel building types that meet targeted residential needs such as student accommodation, build-to-rent, and affordable housing among others. Land between the Rosehill Gardens Racecourse and James Ruse Drive will be developed as a mixed-use entertainment precinct, providing the City of Parramatta and surrounding areas with an 18-hour economy destination, including restaurants and small bars, venues for entertainment, live music, arts and culture, as well as special events which will continue to utilise the racecourse.

The following key statements are taken from the Draft Strategy:

- *Rosehill Racecourse already provides an important hub for recreation and entertainment in central Sydney. There is opportunity to enhance this asset, creating a more diverse and inclusive 18-hour entertainment precinct to serve the region's growing population.*
- *Camellia–Rosehill has the right ingredients to become the engine room of the 21st-century Central River City, with opportunities for growth in urban services and specialisation in water, energy and waste systems innovation. This can be supplemented by a growing recreation and entertainment sector, catalysed by the Rosehill Gardens Racecourse.*
- *A key direction is to provide a flexible land use framework that enables a range of proposed land uses and activities and enables emerging land uses to locate in the precinct. Create opportunities for a more diverse and inclusive entertainment precinct. This will enhance Rosehill Gardens Racecourse as a tourism, recreation, and entertainment destination. Leverage proximity to complimentary land uses and the regional transport networks through improved access arrangements.*

Through flexible planning controls, it is proposed that there will be a diverse range of permissible land uses for parts of the town centre that are closer to the urban services sub-precinct. Building heights are proposed to vary across the sub-precinct. It will also be important to provide a varied and permeable skyline that recognises that the precinct will be visible for the northern foreshore of the Parramatta River and important cultural sites such as Elizabeth Farm.

The  are largely supportive of the incorporation of flexibility into the proposed planning controls, however questions how this will be implemented in practice. Of particular importance is the need to ensure that a wide range of permissible land uses are provided for within the precinct and on  land. Noting the need for future development applications to be lodged to enable any form of redevelopment, a broad range of permissible uses will allow for the most urban design outcome to be determined at the time.

Zoning for the whole of  land should remain mixed to enable a flexible mix of commercial, retail, and residential uses to be developed. This will ensure that the right mix of uses can be considered at a precinct wide level, and act as a catalyst to the realisation of the key objectives of the Draft Strategy.



3. SUMMARY OF RECOMMENDATIONS

The following summary of key recommendations are proposed:

- The [REDACTED] request that dialogue regarding feasibility assessments undertaken to offset potential social infrastructure commences to ensure an equitable outcome is reached. This is particularly important in the context of the extend of reliance being placed on [REDACTED] land to balance the needs of future residents.
- The burden placed on [REDACTED] land is significant and has yet to be discussed with the [REDACTED] in detail. The [REDACTED] request that dialogue regarding feasibility assessments undertaken to offset potential social infrastructure commences to ensure an equitable outcome is reached.
- The [REDACTED] again stress the suitability of their land for development in the short to medium term, noting the site is not subject to the same degree of affectations such as contamination as other sites. This will undeniably act as a catalyst for broader redevelopment of the precinct and will contribute to the infrastructure requirements of the precinct (through possible physical delivery of social infrastructure, and through likely development contributions). Aspirational staging should be cognisant of logical redevelopment opportunities.
- The [REDACTED] request reconsideration of the zoning of land which falls within the 'pipeline consequence affected zone'. The proposed zoning appears to locate only Town Centre (medium) within the affected zone. As has been raised above however, to offset potential social infrastructure obligations of [REDACTED] land, these zones need to provide for Town Centre (High), allowing higher density development closer to key public transport nodes.
- Zoning for the whole of [REDACTED] land should remain mixed to enable a flexible mix of commercial, retail, and residential uses to be developed. This will ensure that the right mix of uses can be considered at a precinct wide level, and act as a catalyst to the realisation of the key objectives of the Draft Strategy.
- Urgent coordination is required with TfNSW, Sydney Metro and [REDACTED] to achieve clarity on the intent of the heavy rail corridor. DPE need to facilitate these discussions so that the corridor can be jointly designed and appropriately incorporated into the future site wide master plan.
- The [REDACTED] request that flexibility be applied to enable site by site assessment of the suitability of basement parking.
- Additionally, specific attention is drawn to the prepared cadastre overlay prepared by [REDACTED] included at Appendix A. The overlay clearly depicts a disconnect between the proposed built form relevant to [REDACTED] land, and existing transport infrastructure corridors. Consideration of the impact of these corridors is critical to understanding achievable yield on ATC land required to facilitate discussions regarding social infrastructure obligations.

4. CONCLUSION

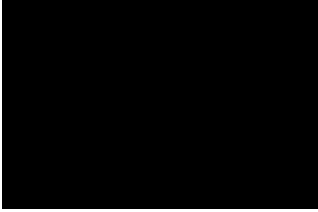
The [REDACTED] looks forward to working with the DPIE to define the direction and findings of the Strategy Paper in preparation for the release of the Draft Place Strategy in October. The [REDACTED] also looks forward to meeting the DPIE to discuss the issues raised in this submission in regard to the strategic and site-specific merit of the Rosehill Racecourse.



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APPENDIX A

CADASTRE OVERLAY

