
Department of Planning and Environment

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Finalisation report for the Camellia– Rosehill Place Strategy

July 2022





Acknowledgement of Country

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Executive summary

The Camellia–Rosehill Place Strategy provides a 20-year vision and plan to revitalise the Camellia–Rosehill precinct.

The place strategy provides a balanced approach to development. It considers the constraints and builds on the strengths of the area and represents a major opportunity to address several key NSW Government policies, commitments, and priorities.

The strategy proposes to strengthen the economic role of Camellia through a significant increase in jobs over 20 years (from about 4,300 jobs in 2016 to 15,400), while also enabling the development of a town centre and 10,000 dwellings. This will substantially support the funding of infrastructure for both the town centre and existing businesses and a range of other economic, social and environmental outcomes.

The place strategy has been led by the NSW Department of Planning and Environment in collaboration with the City of Parramatta Council, Cumberland City Council, state agencies, Aboriginal stakeholders, landowners, and the community.

The draft Camellia–Rosehill Place Strategy was exhibited from 17 December 2021 to 4 March 2022. The exhibition package included an integrated master plan for the precinct and a suite of supporting, technical specialist studies that had informed the creation of the place strategy.

We received a total of 46 submissions on the draft strategy:

- 17 submissions from community members
- 14 submissions from landowners
- 10 submissions from government agencies and utility providers
- 4 submissions from industry groups and other organisations
- one submission from the City of Parramatta Council.

We've heard and responded to all issues raised in the submissions, including:

- support for significant improvements in the transport infrastructure, not only to facilitate the renewal but to address existing issues
- support for protecting and enhancing the environmental areas of the precinct and providing access to the foreshore
- support for a comprehensive and precinct-wide approach to flood management and mitigation
- the importance of a holistic and rigorous approach to remediation and contamination management
- the need to provide sufficient, quality open space in accessible locations, as well as schools and a multipurpose community facility
- general support for retention of large areas of industrial/employment land

- requests to increase density in the industrial and urban services areas to allow greater flexibility of uses and enable newer, high-density industrial building typologies
- the need for further testing and refinement of planning controls
- the importance of early delivery of key infrastructure, including transport and social infrastructure
- concerns that infrastructure costs have been underestimated
- varied views on density in the town centre – concerns about the amount of housing, density and scale of development versus the need for more density due to feasibility issues
- the need to provide surety of funding and timing of delivery of infrastructure needed for the precinct
- the need to ensure appropriate separation and mitigation measures to avoid amenity impacts from land-use conflicts.

This finalisation report documents the consultation process, summarises the issues raised in submissions and reports on how those issues have been addressed to finalise the place strategy and supporting documents.

1 Introduction

1.1 Overview

Camellia–Rosehill is one of Greater Sydney’s important riverside precincts. It is in the geographical heart of Sydney and close to the rapidly growing Parramatta CBD and the Westmead health and innovation district. Approximately 320 hectares in size, Camellia–Rosehill is defined by Parramatta River to the north, Duck River to the east, the M4 Motorway to the south and James Ruse Drive to the west (Figure 1).

Camellia–Rosehill has an important strategic role as an industry and employment hub within the Greater Parramatta to the Olympic Peninsula (GPOP) Economic Corridor.

The Camellia–Rosehill Place Strategy has been prepared in line with the NSW Government’s response to the Greater Cities Commission’s (GCC) GPOP Place-based Infrastructure Compact (PIC) recommendations. The PIC outlined that a coordinated and strategic approach was needed to consider land use changes and conflicts, address remediation issues, and transport challenges. This has been achieved through the preparation of a place strategy.

The place strategy is the first step in revitalising this precinct, establishing a 20-year vision and creating a planning framework that:

- recognises the strategic attributes of the precinct
- enables Aboriginal people to connect to Country and inform and guide the transformation
- guides future land-use and infrastructure investment decisions
- can be delivered with the support of state and local agencies
- ensures growth is aligned with adequate infrastructure provision.

The NSW Department of Planning and Environment has led development of the place strategy and collaborated with the City of Parramatta Council, state agencies, landowners, and the community.

The strategy has been informed by a detailed evidence base that includes an integrated master plan and a range of technical reports (heritage, social infrastructure requirements, economic, environmental, sustainability, hazards and utility and transport infrastructure) that build on the significant body of strategic work and extensive consultation undertaken to date.

We exhibited the draft place strategy, integrated master plan and supporting technical reports from 17 December 2021 to 4 March 2022. Following public exhibition, we reviewed all issues raised in the submissions and used this information to finalise the documents.

This finalisation report outlines the consultation process, summarises the issues raised in submissions and reports on how we addressed those issues in finalising the place strategy and supporting documents.

The place strategy will be given statutory weight through a new ministerial direction made under section 9.1 of the NSW *Environmental Planning and Assessment Act 1979*. However, future rezoning

will be needed to change land use and achieve appropriate built-form outcomes. This will include further investigations to establish the detailed planning and design controls for the precinct.

It is recommended that the Department of Planning and Environment lead a precinct-wide approach to the rezoning. This approach is required to ensure coordination across government to deliver good place outcomes and address the specific constraints that exist for future Camellia development.

The work includes:

- coordinating the preparation of an integrated transport study, flood risk study and plan, and any other studies to support the rezoning
- further developing the master plan and planning and design controls for the precinct
- further studies to confirm the provision, funding, delivery mechanisms and sequencing of infrastructure to ensure it aligns with growth.

We will work closely with council and other key stakeholders to implement the strategy.

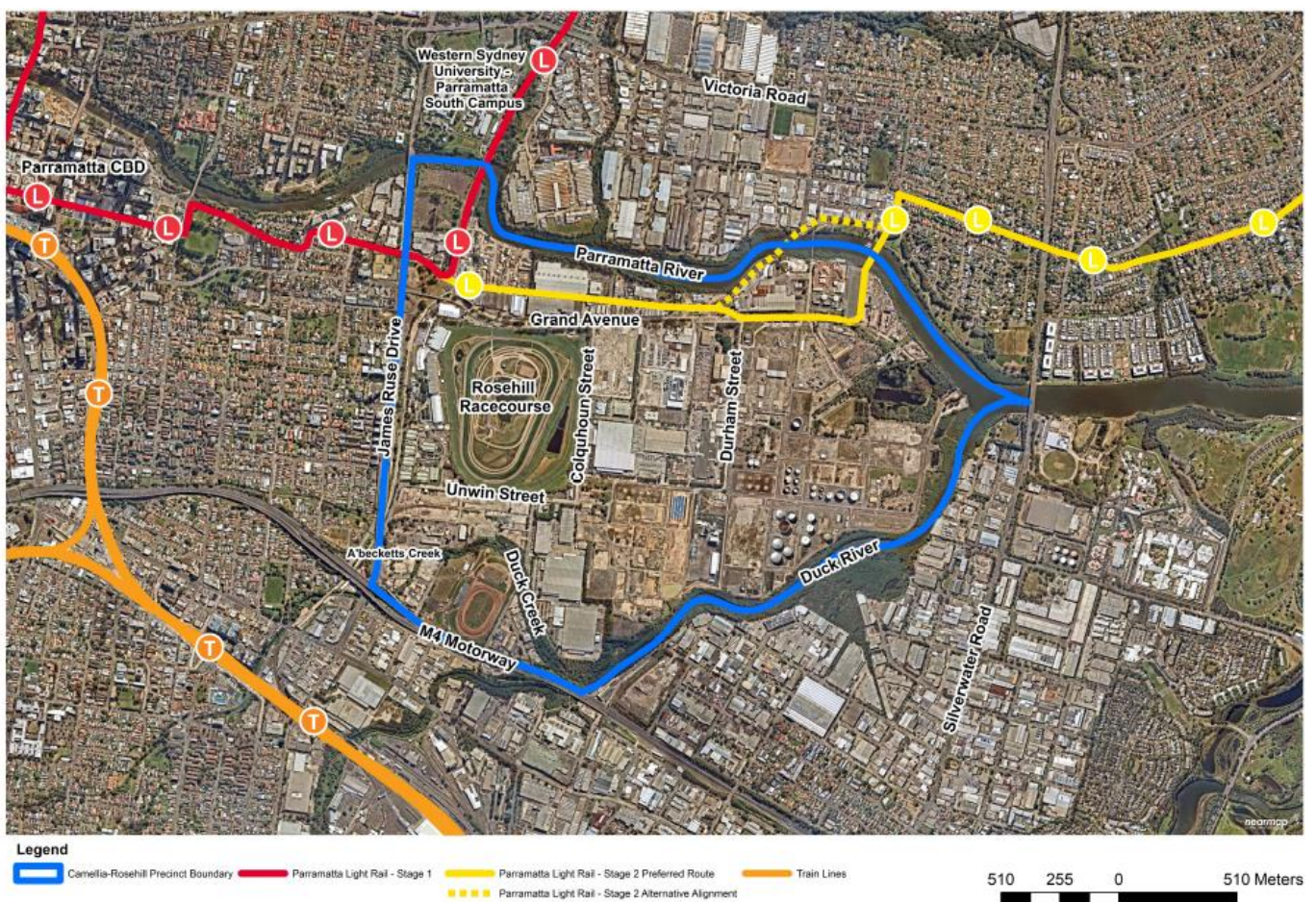


Figure 1: The Camellia–Rosehill precinct

1.2 Overview of the Camellia–Rosehill Place Strategy

The Camellia–Rosehill Place Strategy provides a 20-year vision and plan to revitalise the Camellia–Rosehill precinct. The vision is for a thriving employment hub with a highly liveable residential town supported and enabled by greatly improved transport connectivity and a network of high-quality open space and social infrastructure. The vision also sees the precinct as a showcase of recovery and restoration, where environmental lands and rich heritage are protected, repaired, and enhanced.

Along with an overarching vision for the precinct, the place strategy establishes 5 guiding directions, each with related principles and actions. The guiding directions are:

- recognise and celebrate Country and heritage
- boost economic activity and employment opportunities
- improve access and sustainable travel options and choices
- deliver high-quality place outcomes
- be net-zero ready by 2040 and deliver a holistic approach to environmental management and sustainability.

The place strategy includes a master plan (Figure 2) that provides the urban design framework and focuses on the attributes of 3 sub-precincts:

- an active town centre and entertainment sub-precinct (the ‘front door’) that includes extensive riverfront areas and capitalises on the Parramatta Light Rail Stage 1 investment and improved access to James Ruse Drive
- the urban services sub-precinct (the ‘transition area’), east and south of the town centre, which forms a new business activity corridor and buffer between residential and industrial uses
- the industry sub-precinct (the ‘back yard’) to the east and south, which accommodates heavy industry and employment-generating land uses.

The place strategy also includes:

- a planning framework identifying key land-use controls to be investigated as part of future rezoning
- an infrastructure funding and delivery framework
- a staging plan to ensure infrastructure is aligned with growth.

In all, the place strategy will enable the delivery of up to 14,500 jobs and 10,000 homes for around 24,000 people, supported by a network of new open space and social infrastructure.

The vision for the Camellia–Rosehill precinct

Camellia–Rosehill has an important strategic role as an industry and employment hub within the Greater Parramatta and Olympic Peninsula Economic Corridor. 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 and jobs will be close to public transport and supported by new quality public spaces including public open spaces, public facilities high-quality street infrastructure, and walking and cycling connections.

A new urban services precinct and retention of heavy industrial land will ensure Camellia–Rosehill fulfills its potential to be an employment powerhouse.

Key environmental features such as Parramatta River, Duck River and their wetlands will be protected and enhanced. Camellia’s rich heritage will be preserved, celebrated and promoted. Country and culture will be valued and respected, with the renewal guided by Aboriginal people.

The precinct will be net-zero ready and set a new standard for environmental sustainability with embedded renewable energy networks, integrated remediation and water management strategies and circular economy industries.

Recycled water will be connected to all residences, businesses and public spaces and will support the integrated network of green infrastructure.

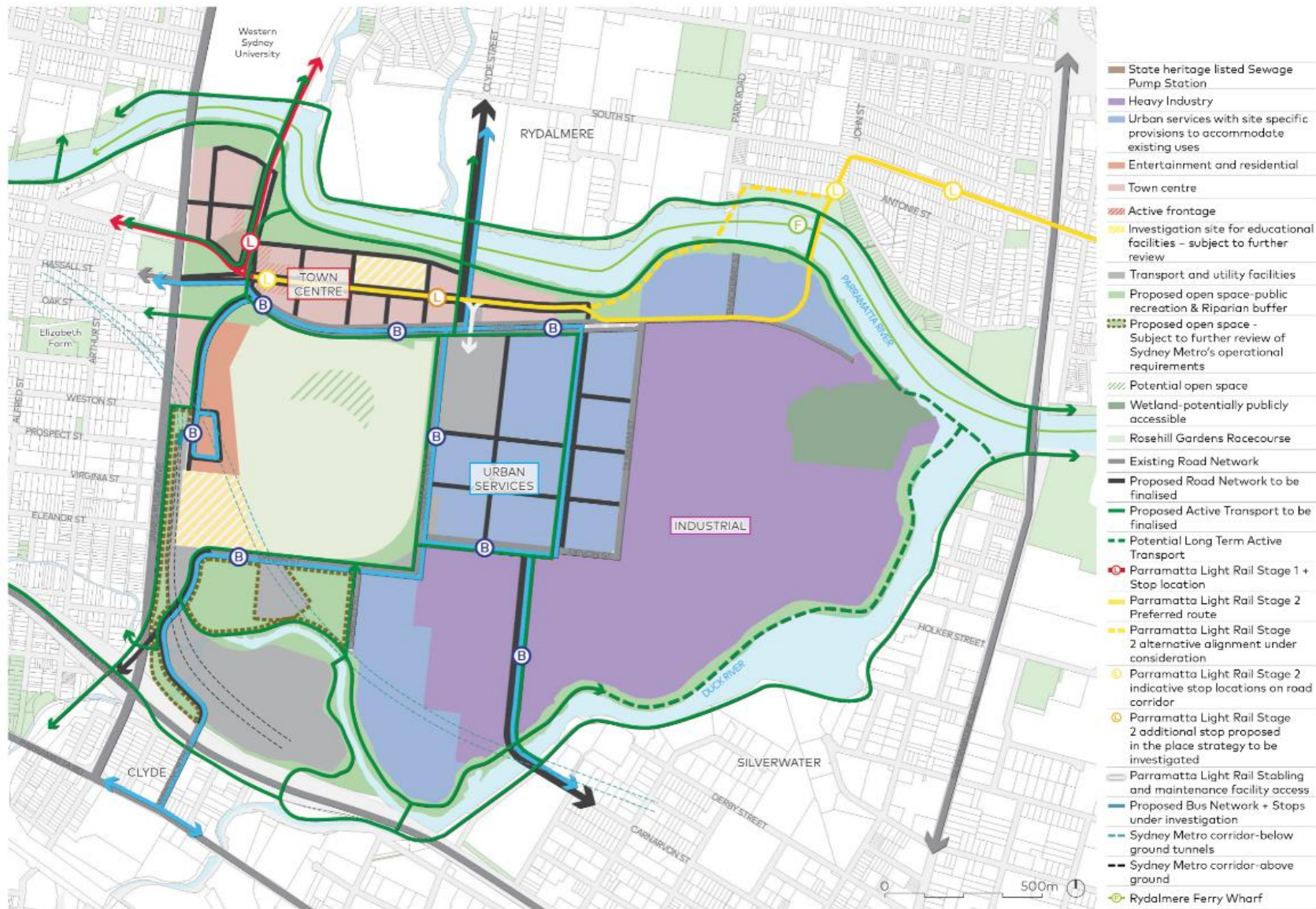


Figure 2: Final integrated master plan

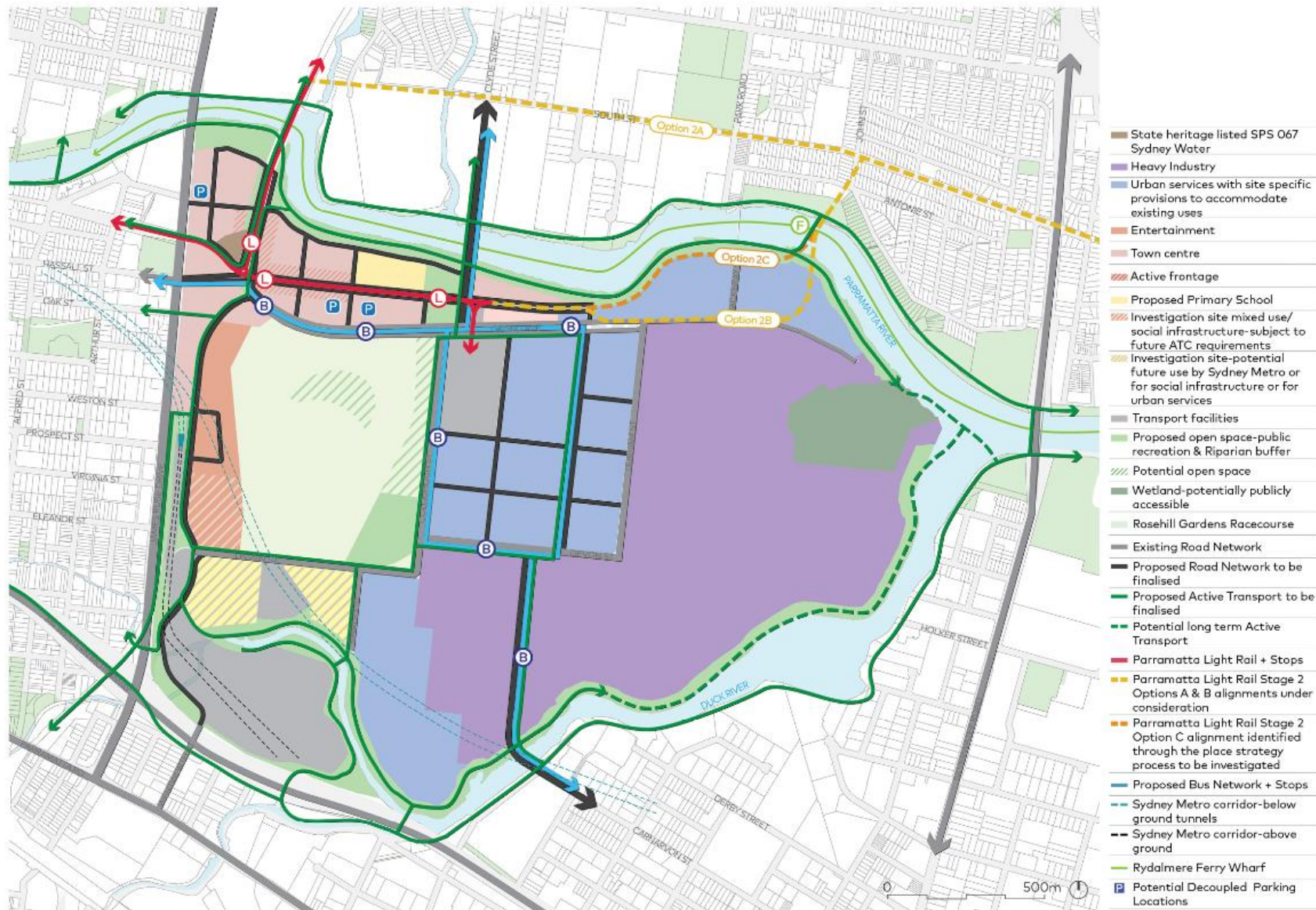


Figure 3: Exhibited integrated master plan

2 Exhibition details

2.1 Prior engagement

The place strategy has been created through a collaborative co-design process and extensive consultation. The following sections summarise the key engagement activities undertaken prior to exhibition of the draft place strategy.

2.1.1 Previous studies

The creation of the place strategy referenced and built on the extensive studies and community input previously provided for the *Draft Camellia Land Use and Infrastructure Strategy* in 2015 and the *Draft Camellia Town Centre Master Plan* in 2018.

2.1.2 Enquiry-by-design process

The draft master plan and place strategy were developed through an ‘enquiry-by-design’ process, providing opportunities for integration and testing of ideas through workshops and direct engagement with government stakeholders.

These workshops and meetings included experts from the department, City of Parramatta Council, Cumberland City Council and state agencies including NSW Department of Education, Government Architect NSW, NSW Health, Office of Sport and Recreation, School Infrastructure NSW, Sydney Olympic Park Authority, Sydney Water, and Transport for NSW.

The enquiry-by-design process also included engagement with interested landowners through presentations to the above representatives and meetings with the project team.

2.1.3 Connecting with Country

Running parallel with the project has been a ‘Connecting with Country’ process. Through consultants The Fulcrum Agency and Dominic Steele Consulting Archaeology, we worked with Aboriginal stakeholders who are contributing to and helping shape the master plan and place strategy for the precinct.

Through this engagement, we gained insights into Aboriginal stakeholders’ experience with and connection to the Camellia–Rosehill precinct, which sits on the land of the Burramattagal people. Opportunities to design with Country, connect to Country, heal Country, and provide social and economic opportunities to local Aboriginal people have been identified.

This process is ongoing and will continue to shape the precinct. We plan to continue Connecting with Country throughout the project’s lifecycle.

Directions for Camellia–Rosehill Place Strategy paper

We released a ‘Directions for Camellia–Rosehill Place Strategy Paper’ for public comment from 15 September to 13 October 2021 to undertake further targeted engagement on the guiding directions and potential master plan approaches for Camellia–Rosehill.

We received a total of 32 submissions, including:

- a submission by the City of Parramatta Council
- 16 landowner submissions
- 9 submissions from state agencies and utility providers
- 4 submissions from community members
- 4 submissions from peak industry bodies and other stakeholder organisations.

The project team also held one-on-one meetings with interested landowners and with agencies.

We considered submissions and feedback when creating the draft Camellia–Rosehill Place Strategy. The exhibition of the directions paper, key items raised in submissions, and how we responded to them are detailed in the [What We Heard – Consultation Report for the Directions for Camellia–Rosehill Place Strategy Paper](#) available from our website.

2.2 Exhibition and submissions period

The draft Camellia–Rosehill Place Strategy was exhibited from 17 December 2021 to 4 March 2022. We received a total of 46 submissions. All submissions have been considered in the finalisation of the place strategy. A summary of key issues and the department’s response to these is outlined in sections 4 and 5 of this report.

2.3 Exhibited materials

The following documentation was publicly exhibited as a part of the draft Camellia–Rosehill Place Strategy:

- draft Camellia–Rosehill Place Strategy
- an Aboriginal cultural heritage assessment and implementation report
- an air and odour implementation report
- a ‘Connecting with Country’ implementation report
- an ecological implementation report
- an economic analysis and implementation report
- a heritage implementation report
- an infrastructure delivery plan
- an integrated master plan
- an integrated water management strategy implementation report

- a landscape implementation report
- a noise and vibration implementation report
- a qualitative risk assessment report (land use safety report)
- a remediation implementation report
- a sustainability implementation report
- a social infrastructure implementation report
- a traffic and transport implementation report a utilities infrastructure implementation report.

These documents were made available on the [Camellia–Rosehill pages of the NSW Planning Portal](#).

An excerpt of the integrated master plan is provided at Figure 3.

2.4 Public notifications

Media release

The department issued a [media release announcing the start of exhibition](#) on 17 December 2021.

Landowner notification

The department sent letters to each private landowner in the Camellia–Rosehill precinct – a total of 46 letters were sent. The letter provided details of the exhibition period and engagement opportunities, and invited submissions on the draft place strategy.

Notification of the surrounding community

In the week of 24 January 2022, the department had 6,752 postcards distributed to community members near the Camellia–Rosehill precinct, including parts of Harris Park, Rydalmere, Parramatta and Silverwater, and the portion of Rosehill outside the precinct (on the western side of James Ruse Drive). The postcard (Figure 4) gave an overview of the proposed place strategy, including details of the exhibition period and engagement opportunities, and invited submissions on the draft place strategy. It included text translated into simplified Chinese, Hindi, Punjabi, Arabic, Gujarati and Korean.



Figure 4: The notification postcard sent to residences surrounding the precinct

Digital notifications

Three emails were sent to subscribers who had signed up on the department’s website to be notified of project updates:

- The first ‘have your say’ email at the start of the exhibition period, sent on 17 December 2021 to 176 recipients, had an open rate of 53.5% and a click-through rate of 21.5%.
- The second email (exhibition reminder) sent on 14 January 2022 to 175 recipients had an open rate of 55% and a click-through rate of 15.2%.
- The final reminder email sent on 1 March 2022 to 174 recipients had an open rate of 55.9% and a click-through rate of 9.4%.
- The ‘open rate’ refers to the percentage of emails sent that were opened by the recipients and the ‘click rate’ refers to the percentage of recipients who clicked a link in the email.

We also ran 3 ads on social media promoting the exhibition and engagement sessions. These ads targeted people aged 18 and over living in the area surrounding the Camellia–Rosehill precinct and ran from 24 January to 24 February 2022. The ads reached 51,571 people and achieved 2,742 link clicks to the Camellia–Rosehill precinct webpage on the department’s website.

2.5 Notification of key stakeholders

In addition to notifications sent to landowners in the precinct and the surrounding community, we advised in writing all key local and state government agencies involved in the precinct. Email notifications were also sent to all people and organisations that made a submission on the earlier *Directions for Camellia–Rosehill Place Strategy Paper*.

2.6 Engagement activities

To maximise potential participation, we held engagement activities predominantly on digital platforms due to the COVID 19 pandemic. Engagement activities were:

- one-on-one 'Talk to a Planner' sessions held via phone or videoconferencing – 8 sessions of 15 to 20 minutes each
- webinars hosted through Adobe Connect – 3 webinars held:
 - a community-focussed session on 31 January 2022 (11 attendees)
 - an industry-focussed session on 2 February 2022 (36 attendees)
 - another community-focussed session on 15 February 2022 (9 attendees)
- a Social Pinpoint map (Figure 5) embedded on the department's Camellia–Rosehill precinct webpage (this map had an interactive version of the master plan with information boxes for key elements and enabled interested parties to place comments on the map in relation to specific items of the masterplan) – visited 2,408 times by 1,063 users who spent an average of 0:55 minutes on the webpage and left a total of 26 comments
- targeted briefings with Aboriginal groups, major landowners, and other key stakeholders.

To publicise these engagement activities, we sent various notifications including the letter to landowners, postcards, emails, and social media advertisements. We also updated the department's Camellia–Rosehill precinct webpage.

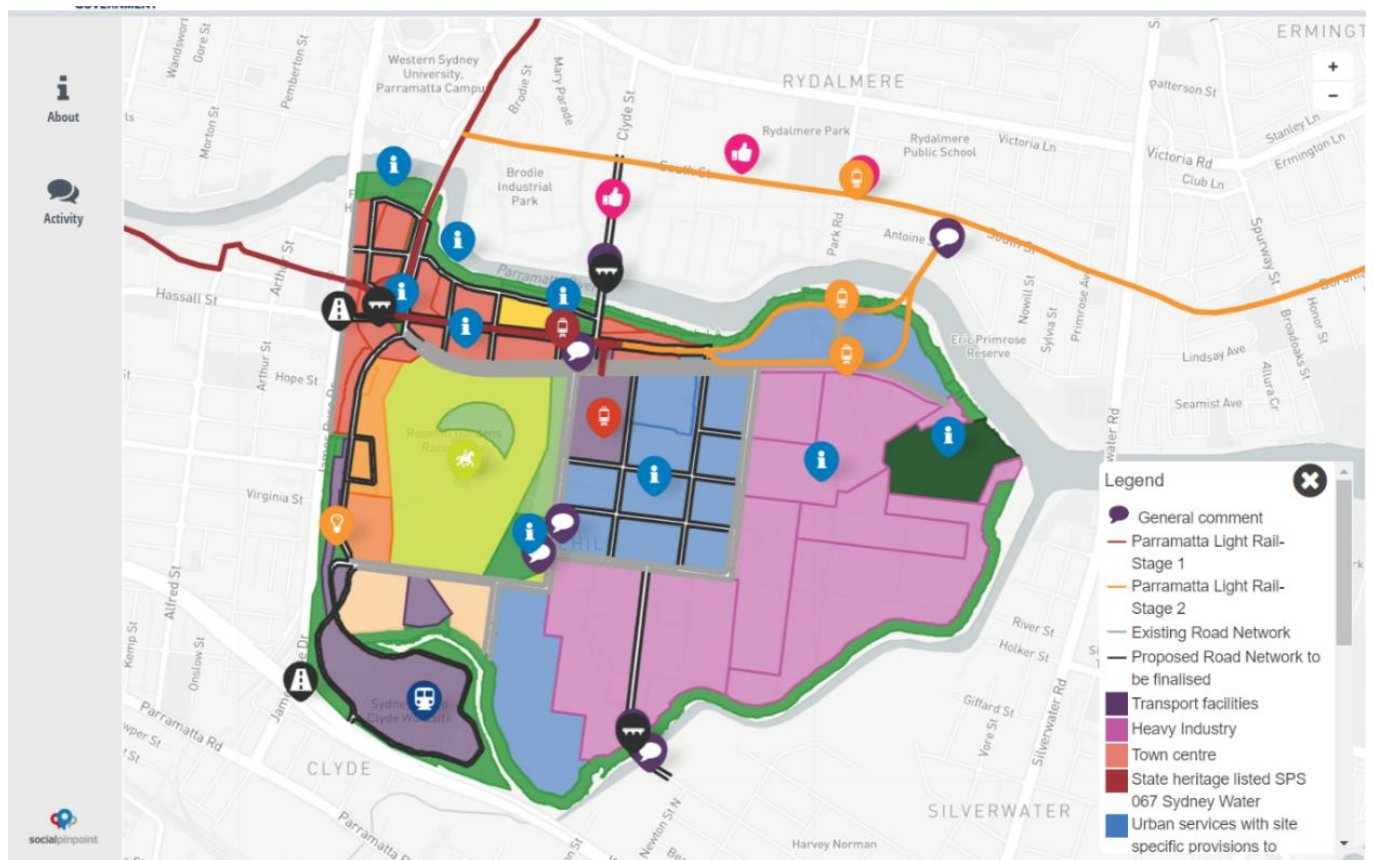


Figure 5: The Social Pinpoint map for the exhibition of the draft Camellia–Rosehill Place Strategy

3 Submission summary

3.1 Submissions received

We received a total of 46 submissions in response to the formal exhibition. Table 1 summarises submissions grouped into major stakeholder groups. Copies of all non-confidential submissions received during the exhibition period are on the on the [Camellia–Rosehill pages of the NSW Planning Portal](#).

Sections 4 and 5 of this report address the key matters raised in submissions, and how we have responded to them in finalising the place strategy.

Supplementary information was also provided by several stakeholders, which has also been considered in the finalisation of the place strategy.

Table 1: Summary of submissions received

Stakeholder group	Number of submissions
Community	17
Landowners	14
Government agencies and utility providers	10
Other stakeholder organisations	2
Industry groups	2
City of Parramatta Council	1
Total	46

3.2 Issues raised in submissions

Departmental staff reviewed all submissions in consultation with council and other relevant agencies (where required).

Key issues raised in submissions have been categorised as shown in Table 2. As most submissions raised more than one issue, the number of issues identified is greater than the total number of submissions received. Our responses to the issues are provided in section 4.

Table 2: Summary of key issues

Issue	Number of mentions
Traffic and transport	107
Environment	99
Social infrastructure	64
Planning controls	63
Infrastructure	62
Place strategy process	47
Development (staging, feasibility, density/scale, yield)	39
Amenity (land-use conflict)	15
Urban design	14
Connecting with Country	11
Economy (night-time economy/employment)	9
Housing (affordable housing/diversity)	9
Hazard risks	8
Heritage	7
Total	554

4 Consideration of issues

This section discusses the issues raised in submissions. Given several submissions requested confidentiality, we have not referred to submissions specifically by name unless they are public submissions or non-confidential issues.

We have made changes to the place strategy, master plan and supporting reports in response to our review of submissions and in collaboration with stakeholders, including council and other state agencies. A consolidated summary of the post-exhibition changes made to the master plan, place strategy and supporting technical reports is given in section 5 of this document.

Appendix A provides response to all issues raised in public submissions.

4.1 Traffic and transport

Traffic and transport were the most significant issues raised. Comments focussed on:

- roads/vehicular infrastructure
- Parramatta Light Rail
- freight and heavy vehicles
- traffic impacts and planning
- integrated transport study
- active and public transport
- decoupled parking.

4.1.1 Roads/Vehicular infrastructure

Overall, submissions supported the proposed new road connections and upgrades, not only to address existing transport issues but to facilitate the renewal of the precinct and support the continued operation and success of businesses. However, concerns were raised about the uncertainty over whether these transport initiatives will be delivered, and the importance of an alternative heavy vehicle route being delivered before work on the town centre begins. This is due to existing congestion issues, the need to separate industrial and residential traffic and concerns over the ability of emergency services to access the precinct. A submission also noted the importance of maintaining the existing connection to Parramatta Road via Wentworth, Kay, and Unwin streets.

There were 2 submissions from landowners suggesting the optimum location for an additional river crossing is further east connecting Thackeray Street in Camellia to Park Road in Rydalmere, as opposed to connecting to Clyde Street in Rydalmere.

Specific concerns were also raised about the ability of Victoria Road to cope with additional traffic from a new northern connection and the potential challenges and feasibility of achieving the M4 connection from Unwin Street.

There was also support from some landowners for the indicative road layout presented in the draft place strategy, while others had concerns about this being locked in at an early stage and affecting existing business operations. Specific recommendations were made regarding detailed design matters, such as the location of signalised intersections, and ensuring any future transport connections are integrated with the Parramatta Light Rail operations, including the maintenance and stabling facility within the precinct.

There were several comments requesting refinement to, and clarification on, wording related to road/vehicular traffic in the transport implementation report.

Department's comments

Upgraded or new road connections

There is already a lack of transport infrastructure in Camellia to support the current use and functioning of the precinct and the efficient delivery of the GPOP Economic Corridor. Transport improvements are needed, not only to deliver the place strategy, but to address the existing deficit, particularly the limited road access. The place strategy and master plan identify several road upgrades and new connections to facilitate the renewal:

- a fine grain street grid within the precinct
- a bridge across the Parramatta River to provide access to Rydalmere and Victoria Road
- potential connections to the M4 Motorway possibly via Unwin Street
- a new bridge connecting Devon Street to Carnarvon Road in Silverwater
- reconfigured access arrangements at the James Ruse Drive/Grand Avenue intersection to prioritise regional traffic along James Ruse Drive and encourage sustainable travel choices to and from the precinct.

The staging plan in the place strategy identifies that transport initiatives need to be progressed as a short-term priority. Transport initiatives identified have been informed by consultation with agencies and the traffic and transport implementation report, which included strategic modelling and strategic cost estimates. Further detailed assessment of all new and improved transport initiatives is needed to determine their strategic need, cost and feasibility. This will be addressed as part of the integrated transport study, which is identified as a priority in the place strategy.

The integrated transport study will confirm new and improved transport infrastructure that needs to be delivered to support the renewal of the precinct, as well as the associated costs. This work will inform the future rezoning and development of the infrastructure framework, including any future strategic business cases.

Northern road connection: Park Road vs Clyde Street

In relation to submissions recommending Park Road as the optimal location for a northern road connection, Transport for NSW has advised that it does not support a vehicular crossing at Park Road for the following reasons:

- Parramatta Light Rail prefers only having a light rail and active transport bridge to allow a dedicated right of way. This is also a safer option for the light rail vehicles.

- At present, there is a continued need for some ferry passengers to transfer to bus services at Rydalmere. This is due to the tides and ferries not being able to travel further up to Parramatta. Parramatta Light Rail Stage 2 provides an opportunity to create a good interchange between buses, ferries and light rail at this location. Any additional vehicle traffic in this area is not supported as it would potentially interfere with interchange operations.
- Previous modelling undertaken by engineering firm WSP as part of the 2018 Camellia Town Centre Master Plan work shows there is a large impact on the intersection of Park Road and Victoria Road that is directly related to the additional uplift in residential properties in the Camellia precinct. Consequently, it is anticipated that there would need to be extensive intersection upgrades to ensure continued operations.
- Opening a vehicular link at Park Road would create a parallel, lower-order (north–south) road ‘rat run’ competing against the Silverwater Road corridor (based on the assumption that the Carnarvon Road bridge connection is also provided from Camellia over Duck River/Creek).
- There are potential negative impacts to residential dwellings south of Victoria Road.

Despite the above, the strategic need and exact location for any northern connection will be confirmed as part of the integrated transport study.

Local road network

The local road network shown in the master plan and place strategy is indicative. The local road network and other detailed matters will be resolved as part of detailed master planning during the rezoning process.

Amendments have been made to the traffic and transport implementation report where appropriate to respond to requests for clarification.

4.1.2 Parramatta Light Rail

Submissions highlighted support for Parramatta Light Rail and recognised its importance as a key enabler for the renewal of the precinct and for providing homes and jobs supported by public transport.

Most submissions supported the extension of the Parramatta Light Rail Stage 2 through the precinct:

- Western Sydney University identified its preferred alignment being along South Street (Option 2A in the draft place strategy).
- City of Parramatta identified Option 2B as its preferred alignment and raised concerns about the foreshore option (Option 2C in the draft place strategy) and risk of precluding recreation and open space opportunities.
- Landowners and industry raised concerns about the potential impacts to businesses and the importance of timing for the determination of the final preferred alignment.

Department’s comments

The draft master plan and place strategy identified Parramatta Light Rail Stage 1, which is currently under construction, and 3 potential route options for Parramatta Light Rail Stage 2:

- Option 2A (preferred alignment) – along South Street through Rydalmere
- Option 2B – through Camellia, following Grand Avenue before crossing Parramatta River to connect with South Street in Rydalmere
- Option 2C (identified through the enquiry by design workshops) – through Camellia, following Grand Avenue until Durham Street, then continuing along the foreshore before crossing Parramatta River to connect with South Street in Rydalmere.

The master plan and place strategy have been updated to align with Parramatta Light Rail Stage 2 preferred route options (publicly announced May 2022). There are 2 routes being investigated, both of which run through Camellia:

- preferred alignment – (formerly known as Option 2B) – through Camellia, following Grand Avenue before crossing Parramatta River to connect with South Street in Rydalmere
- alternative route under consideration – through Camellia, following Grand Avenue until Durham Street, then continuing along the foreshore before crossing Parramatta River to connect with South Street in Rydalmere.

The NSW Government has committed \$602.4 million towards Parramatta Light Rail Stage 2 to start works and commence a detailed planning process. The funding will go towards early works and building the vital bridge connection across the Parramatta River between Wentworth Point to Melrose Park.

An Environmental Impact Statement for the project will be released for public comment by the end of the year (2022).

All feedback on the Parramatta Light Rail has also been referred to Transport for NSW for their consideration.

4.1.3 Freight and heavy vehicles

Submissions suggested changes to the traffic and transport implementation report to ensure that freight and heavy vehicles matters were given due consideration. This includes:

- ensuring efficient freight movements for viable ongoing operation of existing and future businesses
- identifying that new roads would need to cater for appropriately sized vehicles to service retail areas including garbage and retail servicing
- refinement to the principles to identify the importance of safe separation of general traffic movements from freight and heavy vehicles.

Department's comments

Camellia–Rosehill is intended to continue as an important employment precinct with town centre retail, a new urban services precinct, and a heavy industry precinct. The place strategy identifies the importance of planning for a road network that services heavy vehicles and freight movements and the need to minimise amenity impacts.

The town centre (10,000 dwellings) cannot be developed until a viable alternative heavy vehicle route is in place. The place strategy identifies several new and improved transport initiatives to move heavy vehicle traffic away from Grand Avenue, which will also:

- address existing transport issues that currently limit employment productivity and growth
- enable good place outcomes and deliver a high-quality town centre
- support continued and future business operations during the development of the town centre.

Initiatives include the potential M4 connection and other projects subject to further assessment as part of the integrated transport study.

Freight and vehicles routes will also be confirmed during the rezoning process as part of the integrated transport study and detailed master planning.

We have made amendments to the traffic and transport implementation report to ensure that freight and heavy movements are adequately addressed.

4.1.4 Traffic and transport impacts and planning

A range of submissions were received about general traffic and transport issues. This included:

- concern about future traffic congestion, removal of the Clyde rail line and lack of access and connectivity to the precinct
- support for the proposed initiatives to improve access and connectivity

the need to ensure that future transport connections integrate with future development of the town centre

- specific comments on the traffic and transport implementation report including:
 - concern about benchmarking against Pyrmont due to the differences in modal shares and proximity to different types of jobs
 - clarification about whether car-share schemes were considered
 - the need to consider provision of the K-12 school.

Department's comments

We will consider traffic impacts, integration with development sites and the delivery of active/public transport as part of the integrated transport study and detailed master planning during the rezoning process.

After the exhibition, changes were made to the traffic and transport implementation report to addresses feedback, including updated benchmarking against Kingsford.

4.1.5 Integrated transport study

The place strategy identifies (at action 3.1) a priority for the preparation of an integrated transport study to further investigate potential transport investments. We would prepare this study in collaboration with Transport for NSW as part of any future rezoning.

Council provided several recommendations about the scope of the future integrated transport study and requested the action be amended to reflect council's input and involvement.

Council and an agency submission recommended work on the integrated transport study be brought forward and inform the final master plan and place strategy.

Department's comments

We are developing the scope for the integrated transport study and will consider council recommendations as well as any other agency feedback. Action 3.1 in the place strategy has been updated to include council as a support organisation.

The traffic and transport implementation report provides sufficient information to support the strategic-level place strategy. The integrated transport study will support future rezoning and infrastructure framework including any future strategic business cases.

4.1.6 Active and public transport

Existing active and public transport networks across the precinct are limited. The place strategy identifies potential new active and public transport linkages to support the renewal of the precinct and encourage people to use public transport and walk and ride bicycles for shorter length trips. The strategy includes integration of Parramatta Light Rail Stage 1 (under construction) and Stage 2, new bus routes and a network of active transport linkages to, from and within the precinct.

Overall, submissions supported the proposed active transport links and provision of public transport and highlighted the need for these to be delivered early to encourage sustainable travel choices. Concerns were raised about the feasibility of active transport links in certain areas, with requests for further details as well as clarification about location and delivery timeframes.

Submissions from landowners and council identified the need and support for a Metro station, or as a minimum, the provision for the later addition of a Metro station in Camellia to futureproof sustainable travel for Camellia–Rosehill.

Submissions also recommended additional objectives and requirements be included in the master plan to promote greater active and sustainable travel within the precinct, particularly around future school sites.

Department's comments

The finalisation of active transport networks will be determined as part of detailed master planning through the rezoning and development application processes. Parramatta Light Rail Stage 1 is under construction, and bus routes and the preferred alignment of Parramatta Light Rail Stage 2 will be determined by Transport for NSW as part future transport planning.

Sydney Metro analysed options for additional stations at Rydalmere and Camellia as part of the strategic planning for Sydney Metro West. The NSW Government determined not to proceed with a station at Camellia due to identified environmental constraints. Station locations were approved on 11 March 2021 under Sydney Metro West – Concept and Stage 1 (SSI 10038). Future residents, workers and visitors to Camellia–Rosehill will have quick and easy access to the future Metro station at Parramatta via the Parramatta Light Rail.

We have amended the place strategy to include an additional principle under Strategic Direction 3: *“Deliver active transport links and public transport early to encourage sustainable travel choices.*

The master plan has also been updated to include additional objectives and to strengthen references to active and sustainable travel.

4.1.7 Decoupled parking

The draft place strategy and master plan identified that parking will be provided in separate structures that are decoupled and unbundled from the sale of residential or commercial lots. The aim of this was to reduce car dependency and the need for on-site parking as well as assist in improving housing affordability.

There was general support from landowners for decoupled parking – ownership of parking separated from ownership of housing – but not in separate multistorey structures. This was due to:

- potential impacts on the feasibility of development
- the lack of information on the practical operation and implementation of decoupled parking within comparable locations
- poor urban design outcomes because of the need to construct several above-ground structures in the town centre primarily dedicated to car parking, as opposed to parking being provided in sleeved podiums
- accessibility issues with people potentially having to walk long distances to access private vehicles, which would be problematic for certain groups of people such as those with disabilities, elderly residents, visitors, and parents with young kids.

Department's comments

The final place strategy identifies the benefits of decoupled parking within the precinct. However, references to decoupled parking in separate structures has been removed from the place strategy, master plan and supporting documents. This will provide more flexibility in the way decoupled parking can be integrated with the future design of buildings.

We will work with council, agencies and industry to develop planning and design guidelines to deliver decoupled parking solutions as part of the rezoning process.

4.2 Environment

A range of submissions from community members, landowners, and government agencies provided comments in relation to the environment, with statements centred on 4 key areas:

- contamination and remediation
- ecology (including protection and enhancement of existing ecological communities)
- the proposed integrated water cycle management strategy (including flood management)
- sustainability (both on a building and precinct-wide level).

4.2.1 Contamination and remediation

Contamination is a key issue for the precinct, given its industrial heritage. Most sites within the precinct are contaminated to some degree.

An integrated remediation strategy has been prepared to ensure any new development addresses contamination and remediation in a way that contributes to and is consistent with strategic remediation principles for the precinct.

There was support for an integrated precinct-wide remediation approach. However, some submissions thought that the approach to remediation needed to be better resolved for the place strategy. Submissions also emphasised the need to have a comprehensive strategy in place that addresses funding, governance, and staging of contamination remediation and maintenance of contamination management methods.

The NSW Environment Protection Authority provided greater clarity and detail on the wording around contamination in the place strategy and remediation implementation report.

Several comments/recommendations were made by council. This included:

- providing further detail on the durability of certain remediation measures such as capping and the experience of other urban renewal precincts to inform the formulation of the remediation staging framework
- calling for the inclusion of the wetlands in the scope of future contamination protocols and the need for further consultation with the EPA regarding future management
- clarity on ongoing costs of managing contamination
- recommending that a state body or authority be assigned or created to govern the contamination protocols across the precinct
- the need for council involvement in investigating opportunities for the development of a funding framework and governance mechanisms
- objection to any allocation of any residual contamination liabilities to council.
- Some landowner submissions were opposed to the restriction on basement parking for their sites (which was proposed based on the challenges caused by contamination).

Department's comments

The place strategy identifies actions and planning controls to support the implementation of the remediation strategy, including preparing precinct-wide documentation and further investigating governance and funding mechanisms.

We have updated the place strategy and remediation implementation report to address EPA and council feedback.

The place strategy identifies that basement parking will not be permitted except in specific and limited circumstances on sites that are not affected by constraints such as contamination and flooding. This is in line with the recommendations of the remediation strategy. Specific planning controls will be developed as part of the rezoning process to determine where basement parking can be considered.

4.2.2 Ecology

Submissions supported the proposed riparian buffers along the watercourses. Some submissions wanted these buffers expanded. Some submissions sought clarity about buffer size and others noted restrictions on how these areas can be used. There was also a submission objecting to any further buffer to the wetland as proposed in the ecological implementation report.

The Department of Primary Industries – Fisheries highlighted that Parramatta and Duck Rivers are key fish habitats and future development works may trigger the NSW *Fisheries Management Act 1994*. It recommended planning controls adopt the Department of Primary Industry's *Policy and guidelines for fish habitat conservation and management (update 2013)*.

The Department of Planning and Environment's Environment, Energy and Science division (now the Environment and Heritage division) provided specific comments to strengthen aspects on the ecological implementation report.

Council identified that mapping of the wetlands needed to be updated to show protections under other legislative instruments.

Department's comments

The place strategy and master plan provide for a 40-metre foreshore area with the following riparian vegetated buffers to be protected or re-established:

- Parramatta River – 40 metres
- Duck River – 30 metres
- Duck Creek – 20 metres
- A'Becketts Creek – 10 metres.

The remaining area of the foreshore is intended to be used for open space and recreation.

Guidelines for controlled activities in riparian corridors identifies which works and activities can occur on waterfront land in riparian corridors. For example, cycleways and paths (active transport) can be built in all riparian corridors, subject to obtaining controlled activity approval from WaterNSW.

The ecological implementation report has been updated in response to the feedback. The place strategy now identifies the importance of Parramatta and Duck Rivers as key fish habitats and the planning controls refer to Department of Primary Industries' policy and guidelines.

4.2.3 Integrated water cycle management strategy

There was support for the principles of water-sensitive urban design and water reuse and management to improve the water quality outcomes of the surrounding waterways and catchments.

Our Environment and Heritage division provided specific comments on the integrated water cycle management strategy report. This included aspects to strengthen the report, the need to model probable maximum flood impacts and some points of clarification.

Other key issues raised by agencies included the need for:

- further assessment of flooding to confirm school sites are suitable

- greater integration with the existing strategies to improve water quality in the surrounding waterways, particularly Parramatta River.

Council was of the view that a detailed precinct-wide flood study should be completed prior to finalising the place strategy rather than at the rezoning stage. It provided comments on elements that should be included or examined in the flood management strategy.

Council also provided comments on the place strategy to strengthen the wording and provide clarity on certain aspects of water management, such as including a specific action to consult with NSW State Emergency Services (SES) and other emergency services authorities to obtain their advice on the filling approach and access requirements during flood events.

Landowners indicated support for further detailed flood controls and others objected to certain technical aspects of the flood modelling.

Department's comments We have updated the place strategy to address agency and council comments, including:

- updated Action 5.15 to make reference to policy documents to be considered in developing planning controls including Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions by the NSW Office of Environment and Heritage and EPA (2017), and priorities and actions in other relevant strategies, including the Central City District Plan by the Greater Sydney Commission (2018), and Duba, Budu, Barra: Ten Steps to a Living River – the Parramatta River Masterplan by the Parramatta River Catchment Group (2018)
- inclusion of an additional action (5.18) that identifies that consultation is required with NSW State Emergency Service and other emergency service authorities to obtain their advice on the fill approach and access requirements during flood events
- additional planning controls in line with the recommendations of the integrated water cycle management strategy implementation report relating to both flood and water management
- updated text to provide a clearer analysis of flood risks. Page 33 which now describes flood risk for the precinct, page 37 includes description of what the map shows and provides definitions of terms, and page 67 to identify further flooding analysis is required to implement the master plan
- reference to the need to consider design considerations for flood-resilient buildings and open spaces as part of the public domain strategy.

We have updated the integrated water cycle management strategy implementation report to address agency and council comments, including:

- inclusion of modelling of probable maximum flood
- further consideration of mitigation measures such as provision of a flood-free evacuation route to a flood-free area
- updated text to clarify modelling assumptions
- preliminary analysis of consistency with Local Planning Direction 4.3 Flooding and associated guide

- stronger language and greater integration with existing government strategies such as the DUBU BUDU BARRA: Ten Steps to a Living River - the Parramatta River Masterplan.

Responses to technical aspects raised in landowner submissions have been considered by our technical consultants and will be considered further as part of the detailed flood risk study and plan.

4.2.4 Sustainability

Submissions supported the place strategy's aim to deliver a net zero precinct, with some submissions recommending the timeframe for this be brought forward to 2040 (from the proposed 2050 state target). Agencies and council recommended:

- more clarity and emphasis on strategies to increase support for electric vehicles (EV) by removing barriers to accessing EV infrastructure
- more emphasis on the opportunities for the development of the circular economy and sustainable materials in the precinct – both in their manufacture in the urban services and industrial sub-precincts and their use in construction and operation of buildings in the town centre sub-precinct.

Department's comments

We have updated the place strategy to target reaching net zero emissions by 2040 (earlier than the state target of 2050), which has been confirmed as achievable for a new and well-designed precinct like Camellia. Refer to the sustainability strategy for further details.

We have also updated the strategy to emphasise the importance of EV infrastructure and opportunities to establish and grow circular economies in the precinct.

4.3 Social infrastructure provision

A range of submissions from community members, landowners, City of Parramatta Council and government agencies provided comments in relation to social infrastructure. These focussed on the provision of education facilities, open space, public spaces and community facilities.

4.3.1 Educational facilities

A key principle of the place strategy is to provide social infrastructure locally to support planned residential growth within the precinct.

Preferred sites for education facilities have been identified, considering the constraints of the precinct and input from a range of stakeholders. The draft place strategy identified the potential demand for a:

- 2-hectare primary school collocated with a district park and open space along Parramatta River
- 6-hectare K-12 school adjacent to the Rosehill Gardens Racecourse or on land surplus to Sydney Metro's needs.

A range of issues were raised in the submissions with respect to educational facilities within the precinct. This included:

- support for the provision of education facilities within the precinct but noting that the location of a K-12 school site needed to be resolved. There was also a submission noting that opportunities outside of the precinct along the Parramatta Light Rail route should be explored
- preference for the location of the K-12 school site at the existing horse stables located in the south-west corner of the racecourse subject to further detailed investigations. Surplus Sydney Metro land was considered unsuitable due to disconnection from community facilities, inaccessibility, safety concerns that may arise from heavy vehicles using Unwin Street, and the need to resolve flood considerations
- reiteration that the possibility of a K-12 education facility will only be required if demand thresholds meet the required population benchmarks
- need for further detailed investigations to confirm that school sites are suitable and could meet School Infrastructure NSW's '*School Site Selection and Development Guidelines*'.
- the need for education facility sites to be sized to provide quality public education and open space
- the need for the primary school to be delivered in the early stages of development.
- advocacy for the efficient use of land in relation to education facilities and shared use arrangements.
- clarification on, and preferences for, delivery mechanisms for education facilities.

Department's comments

The preferred location of the K-12 school is now identified as the existing horse stables in the south-west corner of the racecourse.

The plan proposes indicative areas within the precinct to be further investigated for educational facilities, including a primary school site of 2 hectares and a K–12 high school site of 5.4 hectares. Both sites exceed School Infrastructure NSW’s minimum requirements for standard school site sizes in high-density areas (inclusive of built form and open space) as set out in Table 3. The design and the land area required for educational facilities will be resolved through the next phase of the process.

The staging plan in the place strategy now identifies that the primary school is to be planned and developed in the short term to ensure that future residents have access to high-quality education facilities in their local area.

To acknowledge that both sites shown on the plans are subject to further detailed investigations by School Infrastructure NSW and the Department to confirm suitability, we have updated the master plan and place strategy to note the sites as, ‘*Investigation sites for education facilities, subject to further review*’. Should the investigations find that the site/s are not suitable for the school land uses, a process to identify alternative sites will be completed. Any new school projects are dependent on long-term residential population growth. We will work closely with School Infrastructure NSW to ensure the delivery of schools is aligned with demand.

Matters such as mechanisms to deliver the schools, shared-use arrangements, design and integration of active and public transport will be resolved in the next phase of the planning process.

Table 3: School Infrastructure NSW criteria for schools in high density town centre areas¹

Criteria	Explanation
<p>High density/town centre areas:</p> <ul style="list-style-type: none"> 1.5 ha for a primary school (capacity up to 1,000 students) 2.5 ha for a secondary school (capacity up to 2,000 students). <p>Areas are determined based on individual assessment and school design.</p>	<p>While it is preferable to maintain building heights of up to 4 storeys with open space provided at grade (particularly for primary schools), innovative solutions for school design in dense urban areas may be appropriate. School designs that demonstrate building heights above 4 storeys (in context with the surrounding area) may explore open space within levels of the building, on rooftops, under the building and/or shared with the community.</p> <p>This may reduce the site area required whilst still providing access to open space at the standard of 10sqm per student. It is important that the additional cost associated with building above 4 storeys is balanced with the cost of land, to determine value for money. It is also important to ensure that the site has space to cater for fluctuations in enrolment, which may require the use of demountables or additional permanent built form.</p> <p>The appropriateness of this approach is to be determined by School Infrastructure NSW on a project-by-project basis and is subject to a range of sub criteria including the desired educational model, site context, appropriate access and transport networks, safety and security.</p>

¹ Source: School Site Selection and Development, NSW Department of Education – School Infrastructure NSW, October 2020

4.3.2 Provision and location of open space

A variety of open spaces and recreational opportunities are provided to meet the demand of the future population of residents and workers.

Overall, there was support for the commitment to open space, and in particular foreshore public access, and the need for this to be delivered early, given the community benefits.

However, submissions from council, community members and agencies raised concerns about the minimum size of open space areas and the need for open space to be large enough to be functional. It also needed to be well located (relative to areas of greatest residential density) and serviced by public transport. Council recommended either reducing density or adding additional land for open space to address the shortfall.

Concerns were also raised about the location of the proposed district park in the draft place strategy, which was on the eastern area of the racecourse. Concerns were primarily due to encroachment onto the racetrack affecting racecourse operations, which are intended to continue.

Council specifically recommended that the draft place strategy and master plan:

- identify potential locations for 12 play spaces, an indoor court, 2 outdoor multipurpose courts and 2 fitness stations
- make provision for dog off-leash areas, which are becoming increasingly important to the social sustainability of high-density communities
- consider a longer-term aspiration for providing regional open space in Camellia by using the wetlands and retrofitting industrial or urban service land
- further investigate how foreshore access will be delivered in terms of the appropriate staging/sequencing of public spaces and integrated pedestrian/cycle links.

There were also comments from the community about the loss of the speedway and the need for better access to a more diverse range of water recreation activities.

Sydney Metro has also identified that its residual land south of Unwin Street is needed for flood storage and can be used for open space. Storage is needed to mitigate the impacts of flooding associated with the construction of the Clyde Stabling and Maintenance Facility and Sydney Metro West as well as to offset the loss of the speedway. However, the exact size of available land remains subject to a review of Sydney Metro's operational requirements.

Council provided additional comments advising of the importance of the southern district open spaces on residual Metro land, particularly the sporting fields, to achieving adequate open space and recreation provision.

Department's comments

We have undertaken a detailed review of open space in consultation with the project team and other stakeholders. This included a benchmarking study of open space versus density in similar urban renewal precincts, and a review of design and size of other foreshore parks in urban renewal precincts across Sydney.

We have modified the place strategy and master plan to improve access to and increase provision of open space, particularly for the town centre. Key changes include the following:

- The proposed district park on the eastern edge of the racecourse and local parks adjacent to the northern road connection have been removed, labelled 5 and 7 in Figure 6.
- A new district foreshore park has been added in the town centre along the river foreshore, labelled 6 in Figure 7.
- New local open space is provided at the entrance to the precinct and along the northern and southern edges of the racecourse, labelled 3, 4, 5, 7 and 14 in Figure 7.
- New local open space is provided within the urban services sub-precinct, labelled 9 in Figure 7.
- Surplus Sydney Metro land is identified as a preferred location for district open space with the potential to accommodate sporting field, labelled 12 and 13 in Figure 7.

Potential locations for sporting field, play spaces, 3 outdoor multipurpose courts, 2 fitness stations, off-leash dog areas and indoor courts have also been identified (Figure 7). The exact design of open space areas, including the provision of sporting fields, place spaces and water recreational facilities such as kayak/boat launching facilities, will be explored as part of more detailed design processes.

Overall, open space across the precinct has increased from the 43.7hectares (13.6%) proposed in the draft place strategy to 54.5hectares (16.9%) (Figure 7). Open space in the town centre has increased from 6.4hectares (14%) to 27.6hectares (22%). All residents are now within 200 metres of local open space and 800 metres of district open space, except for a small portion of the town centre in the east of the precinct, which is within the 1,200 metres of district open space.

While the master plan and place strategy do not meet council's population-based open space target of 72 hectares, the area identified in the master plan is similar to other urban renewal precincts. It meets council's target benchmark of 15% of land as open space, with 22% of land within the town centre proposed for open space.

There are also other opportunities to increase open space provision through the next phase of the process. These include:

- use of racetrack land (2.6 hectares)
- open space provided within the urban services precinct as part of future redevelopment
- provision of indoor recreation centres within the entertainment or urban services areas.

The Government Architect NSW's *'Draft Greener Places Design Guide'* highlights that population-based spatial benchmarks are not effective without high levels of quality control. They often work against opportunities for multiple uses and innovative solutions, particularly in high-density urban areas. The provision of high-quality open spaces in accessible locations better caters to

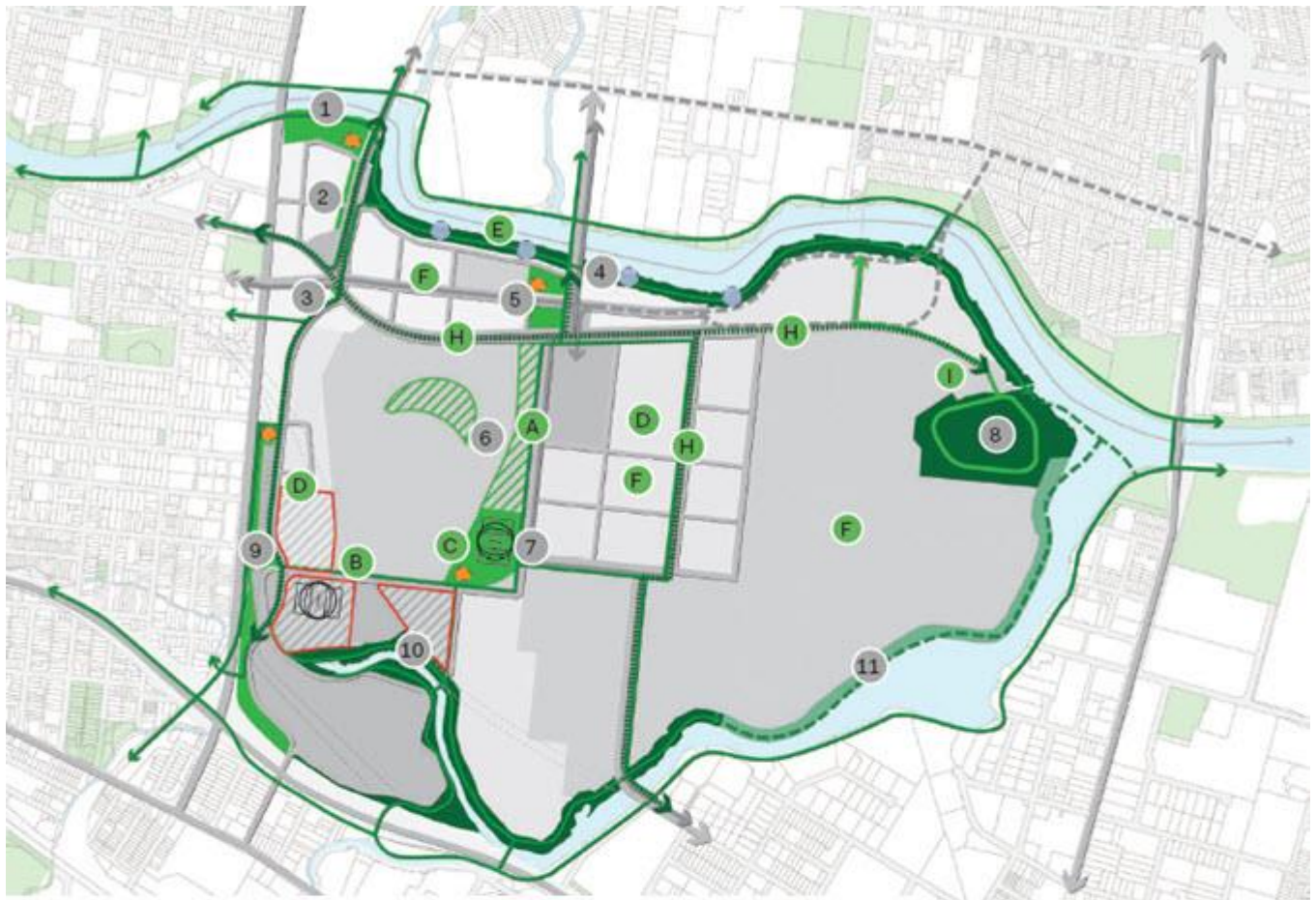
communities' demands than more parcels of poor-quality open spaces. Therefore, we intend to focus on making the proposed parks high-quality spaces that work well both day and night.

We also acknowledge there is a shortfall of open space in Catchment 4 of the Parramatta local government area (in which the Camellia–Rosehill precinct is located) as defined in council's Community Infrastructure Strategy (Draft), July 2020. However, there are limited opportunities to provide additional open space within the precinct, such as regional open space as suggested by council, without compromising employment outcomes.

We have included an additional action (Action 4.8) to address council's comment regarding the need to deliver the foreshore.

We have also included a note on the master plan and amended an action (Action 4.5) in the place strategy to identify that the department will continue investigating the suitability of surplus land at the Clyde Stabling and Maintenance Facility for district open space, considering Sydney Metro's operational requirements.

For further information regarding the provision of open space and recreational facilities, refer to the social infrastructure and landscape implementation reports.



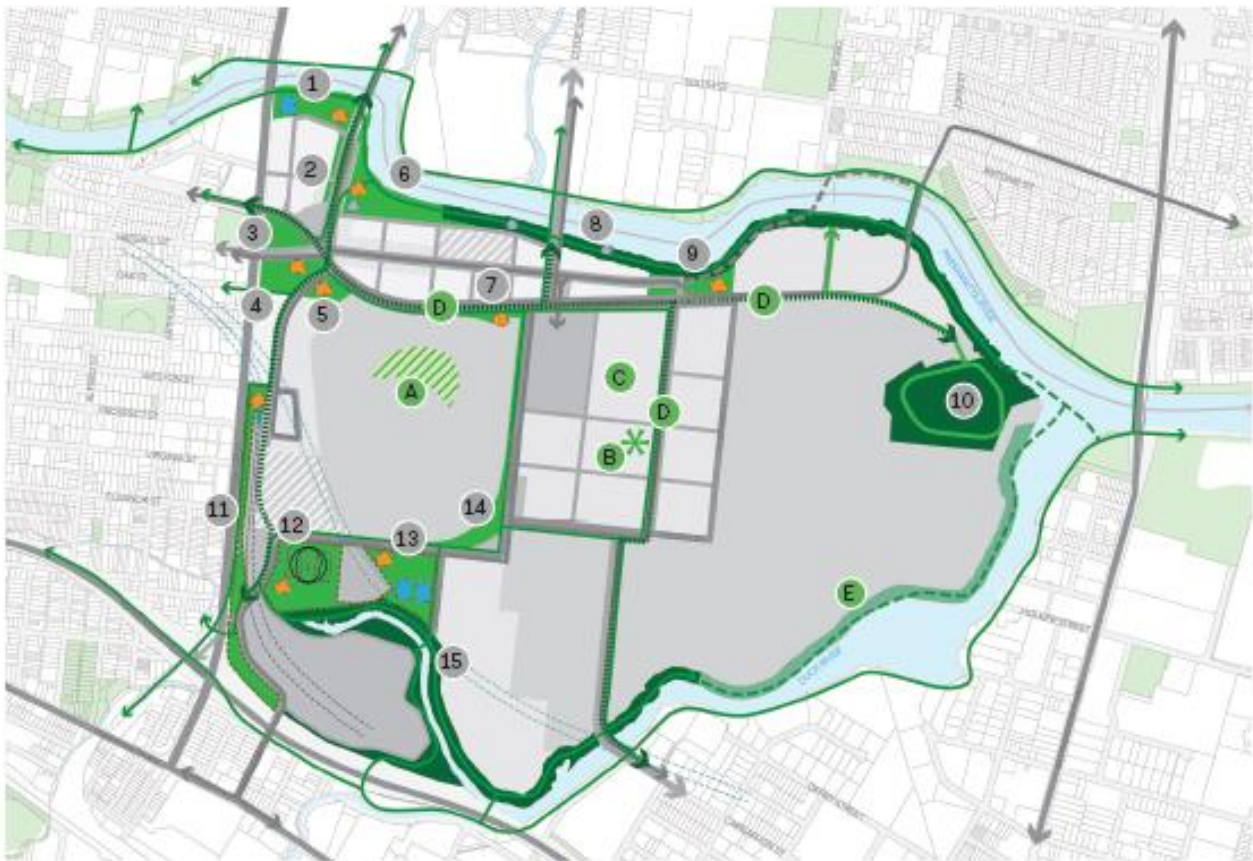
Landscape Provision

- 1 District Park (2.4ha)
- 2 Local Park (0.3ha)
- 3 Local Park (0.13ha)
- 4 Linear foreshore park (10.2ha)
- 5 Local park (1.6Ha)
- 6 Potential for publicly accessible private open space (6.4ha)
- 7 District park (3.9ha)
- 8 Wetland (9.9ha)
- 9 Local linear park (4.0ha)
- 10 Linear foreshore park (11.3ha)
- 11 40m Riparian Buffer
- ← Proposed Active Transport connection
- ← Potential long term Active Transport connection

Opportunities

- A Convert additional racetrack land to open space (2ha)
- B Convert racetrack / Metro land to open space (7.6ha)
- C Locate sportsfields in district park(s)
- D Indoor recreation centre within entertainment, urban services area or district parks
- E Fitness stations along green links
- F 35% canopy cover target for mixed use, urban services, entertainment and industrial
- G 45% canopy cover target for open space
- H Emphasise green links / streets
- I Provide an active transport connection along Grand Ave and to the wetlands and footpath/ boardwalk
- Play spaces to be included in all parks

Figure 6. Open space provision proposed in the draft Camellia-Rosehill Place Strategy



Open Space Provision

- 1 District Park (2.4ha)
- 2 Local Park (0.3ha)
- 3 Local Park (1.1ha)
- 4 Local Park (2.0ha)
- 5 Local Park (0.8ha)
- 6 District Park (3.4ha)
- 7 Local Linear Park (0.5ha)
- 8 Linear Foreshore Park (8.3ha)
- 9 Local Park (2.8ha)
- 10 Wetland (9.9ha)
- 11 Local Linear Park (3.5ha)*
- 12 Sports Field (4.6ha)*
- 13 District Park (3.2ha)*
- 14 Local Park (2.0ha)
- 15 Linear Foreshore Park (11.4ha)

*size subject to further review of Sydney Metro's operational requirements

Landscape Opportunities

- A Restricted access public use of racetrack land as open space (2.6ha)
- B Local open space to be provided within urban services land as part of future development
- C Indoor recreation centre within entertainment or urban services areas
- D Emphasise green links / streets
- E Potential future 40m wide linear foreshore public open space (6.2Ha)
- Orange circle Play spaces to be included in all parks
- Sports fields (combined cricket/2 x soccer fields)
- Multi-use court
- Fitness stations along Parramatta River linear park
- Proposed Active Transport connection
- Potential long term Active Transport connection
- Open space
- Wetland/Linear foreshore park
- Proposed open space - Subject to further review of Sydney Metro's operational requirements

Figure 7. Open space provision – final Camellia–Rosehill Place Strategy

4.3.3 Public spaces

The NSW Government's Public Spaces Charter defines public space as:

'...places publicly owned or of public use, accessible and enjoyable by all for free and without a profit motive, and these include:

- Public open spaces: active and passive (including parks, gardens, playgrounds, public beaches, riverbanks and waterfronts, outdoor playing fields and courts, and publicly accessible bushland)
- Public facilities: public libraries, museums, galleries, civic/community centres, showgrounds and indoor public sports facilities
- Streets: streets, avenues and boulevards, squares and plazas, pavements, passages and lanes, and bicycle paths'

Submissions regarding public space were from agencies and council. The majority were suggestions to improve the wording in the place strategy in relation to public spaces and the need to acknowledge the role digital connectivity plays in delivering high-quality, safe and smart public spaces.

Council and our internal teams recommended the following be prepared to support the renewal of the precinct:

- a public domain strategy that addresses design requirements (such as lighting and signage) for safe pedestrian and cycle routes/connections to and from the town centre and entertainment sub-precincts from all directions
- a delivery plan to provide required enabling digital connectivity and infrastructure (connected street furniture and smart poles) in the public domain and open spaces
- a public spaces activation framework for the precinct as part of the master-planning process, to support the preparation, delivery, and evaluation of activated public spaces and the benefits these provide.

There were also recommendations to reference the *(draft) Design and Place State Environmental Planning Policy 2021* in the planning controls.

Department's comments

Submissions mostly aligned with the intent of the place strategy. However, we have updated the vision to make specific reference to public space. The following additional action (Action 4.2) has also been included in the place strategy in response to feedback.

That council prepare a public domain strategy with support from the department and Transport for NSW for the precinct at the rezoning stage, that includes the following elements:

- design requirements (such as lighting and signage) for safe pedestrian and cycle routes/connections to and from the town centre and entertainment sub-precincts in all directions
- design considerations for flood-resilient buildings, parks, and open spaces
- a public spaces activation framework using the NSW Guide to Activation and NSW Guide to Preparing an Activation Framework
- a delivery plan that ensures the required enabling digital connectivity and infrastructure are included in the public domain and open spaces. Delivery plan is to refer to the NSW Smart Public Spaces Guide.

A reference to the public activation framework has also been included in the planning controls.

4.3.4 Community facilities

Most of the comments in relation to community facilities were from council. Comments were to:

- ensure community facilities are located close to new residential dwellings
- provide greater certainty on community facility location
- require a 4,328m² multipurpose community hub, based on forecast population, as opposed to 4,000 m². This should include a 1,855 m² library space, 1,954 m² community and subsidised space and a 489 m² cultural space
- ensure facilities are delivered over no more than 3 floors starting from ground level, include street frontage, be highly visible, achieve high solar access and natural ventilation, are adjacent to public open space, and not located near any incompatible uses (such as pubs or gambling venues).

Submissions by landowners within the town centre expressed interest for the community space to be located on their land. A community member also raised concerns about the adequacy of community facilities being proposed.

Department's comments

We have amended the place strategy to identify a requirement for a multipurpose community hub of a minimum of 4,300 m² within the town centre. The infrastructure delivery plan identifies that this facility could be located at any key site. The exact location of the community hub will be further resolved through the rezoning process.

Design principles and planning controls for specific land uses including the multipurpose community hub will be developed as part of the rezoning process.

4.4 Planning controls

Many submissions made comments on the planning controls proposed for the precinct. These primarily related to zoning, development standards such as height and floor space ratio, and other matters such as hazard risk, flooding and land uses.

Submissions broadly supported the proposed land uses and land-use arrangements, including focussing homes around public transport. Some landowners requested amendments to the zoning for their sites or that certain social and transport infrastructure be relocated from their sites.

Several landowner submissions requested increases to the proposed maximum building height and floor space ratio controls for the urban services sub-precinct. These submissions stated that the proposed maximum height of 20 metres and floor space ratio of 1:1 was too restrictive and would inhibit the development of more modern, multistorey warehousing and light industrial developments. These submissions argued that denser forms of urban services development would be well suited to the precinct, given its strategic location.

Submissions sought an increase in height control to between 30 and 60 metres, and to have the floor space ratio increased to between 1.5:1 and 3.5:1 (precise figures varied across submissions), which aligned to controls for urban services land in Alexandria.

There was also a submission specifically relating to land south of Durham Street (surplus Viva Energy land) seeking additional height. This was to meet demand for industrial land and facilitate multistorey industrial development.

Multiple landowner submissions sought to increase the density of development in the town centre. The submissions argued that increased density was needed to make development projects feasible or improve feasibility to compensate for the provision of social infrastructure and costs of remediation and other infrastructure.

Other key issues raised by landowners included:

- support for site-specific detailed controls
- the need for flexible built-form controls with specific comments on matters such as podium heights and sizes
- support for investigation of special provisions to protect certain existing uses.

Western Sydney University highlighted the need for future planning controls to consider the context of the area, including the Parramatta River and the heritage listing of its campus adjacent to Camellia.

Council provided the following key comments in respect of land use and planning controls. Council recommended:

- removing detailed built form controls, floor space ratio and height controls from the place strategy and master plan so they could be examined in greater detail
- ensuring any future zoning of the entertainment precinct that permits residential does not allow the density cap to be exceeded
- sites that are proposed to be Council dedicated public space to be zoned RE1 Public Recreation

- considering higher-order uses such as health, education and innovation.

Council and a landowner also recommended that land south of Durham Street be reconsidered for urban services, as opposed to heavy industry.

Department’s comments

Land use and planning controls

Land use and planning controls proposed in the place strategy have been informed by technical studies and extensive consultation with agency stakeholders. Where appropriate, we have refined the planning controls in response to stakeholder feedback. As identified in the place strategy, planning controls will be further developed and confirmed through the rezoning process, which will include detailed urban design analysis as well as a precinct-wide flood risk study and plan.

Development standards proposed for urban services and certain industrial land

We did additional investigations into urban services and industrial development typologies, particularly newer, higher-density typologies starting to be developed in the local market. These investigations considered urban design, transport and economic impacts and the hazard risk of these denser typologies. This work has identified that there is a potential for greater density in the urban services and industrial sub-precincts. A summary of the changes made is included in Table 4. Zoning and development standards will be confirmed through the rezoning process.

Table 4: Changes in proposed urban services and industrial sub-precinct planning controls from the draft to the final place strategy

Sub-precinct – Control	Proposed in draft place strategy	In final place strategy
Urban services – Building height	20m	No control (development will be controlled through application of the floor space ratio).
Urban services – Floor space ratio	1:1	1.5:1
Heavy industry– Building height	16m	16m
Heavy industry– Floor space ratio	1:1	1:1
Heavy industry – Devon Street industrial subdivision – Building height	16m	No control (development will be controlled through application of the floor space ratio).
Heavy industry – Devon Street industrial subdivision – Floor space ratio	1:1	1.5:1

Development standards and built form proposed for the town centre

We have undertaken a benchmarking study to demonstrate that density in the town centre and provision of open space (as amended) is similar to other urban renewal precincts.

The built form presented in the exhibited place strategy and master plan was indicative to demonstrate the proposed height and density controls were workable at a high level and identify impacts that would need to be considered further, such as overshadowing and setbacks. We have removed the indicative-built form information as it will be subject to further detailed analysis. However, the indicative height and floor space ratio controls will be included as this not only provides certainty for landowners but manages expectations. We have included a statement in the place strategy that states built form will be tested further as part of the rezoning process.

We will work with council and other stakeholders to develop the planning controls as part of the rezoning process to ensure good built form and place outcomes.

Further analysis has been undertaken to confirm that proposed land-use controls are feasible. Refer to section 4.7.2 of this document for further details.

Entertainment precinct

An exhibited residential area in the north west now accommodates local open space and residential density has now been reallocated to the mixed-use entertainment precinct. This has been accounted for as part of the overall dwelling cap of 10,000 dwellings.

Health, education and innovation uses

We examined land-use mix, industry clusters and competitive advantage issues as part of economic and land-use analysis. Health and education uses were not considered appropriate due to impacts on the Westmead precinct and the lack of competitive advantage. A cluster of circular economy uses, linked to city building industries and the urban services function were determined to be a more appropriate focus to meet the needs of the GPOP area and to achieve employment and competitive advantage.

Industrial land south of Durham Street

Land south of Durham Street will be retained for heavy industry. This is in line with recent development approvals. It accounts for demand and the loss of heavy industrial land used for the Clyde Stabling and Maintenance Facility. It also satisfies the proposal for heavy industry along the Parramatta River to transition to urban services.

Appendix of land use tables

We have removed the land-use tables identifying the new employment zones from the appendices of the place strategy to ensure document currency. This new framework is now on public exhibition and may be further refined. Refer to [the employment zones reform pages](#) of our website for further detail.

4.5 Infrastructure

We received comments relating to infrastructure mainly from council, agencies and landowners. A large proportion of submissions commented on infrastructure funding and delivery, with a much smaller number of comments on utility and digital infrastructure matters.

4.5.1 Infrastructure funding, and delivery

Most of the comments about funding and delivery were received from council. Comments related to:

- concerns that infrastructure costs and the funding gap were underestimated, considering:
 - whether provision has been made for ongoing remediation management costs
 - exclusion of costs associated with management and access to wetlands
 - missing costs associated with ‘conditions of consent’
 - costs for sustainability measures not addressed
- the absence of information about how the potential funding gap would be addressed
- a lack of detail on how infrastructure would be aligned with growth and the need for further detailed staging strategy including threshold triggers for infrastructure delivery and analysis of the use of proposed mechanisms
- investigating funding mechanisms whereby future developments could fund ongoing maintenance costs for things like foreshore or public open space areas
- the need for arrangements to be in place before the rezoning of the precinct, to ensure that council is not unreasonably burdened by any infrastructure funding shortfalls.

Some landowners indicated support for the private sector to contribute to infrastructure costs. Others had specific comments on the ‘key sites mechanism’, including the view that provision of any social infrastructure should be appropriately offset with greater density/yield and/or appropriate offsets to developer contributions. Another landholder objected to the proposal to introduce additional rates or charges by way of a special rate levy as, in their view, new and upgraded infrastructure would provide a direct benefit to their operations.

Transport for NSW was involved in reviewing the transport infrastructure costs while School Infrastructure NSW had comments on the mechanisms for the delivery of social infrastructure. Agencies also identified the need to continue to work collaboratively with the department to fund and deliver infrastructure.

Business Western Sydney identified the importance of partnering with the private sector to deliver community and transport infrastructure.

A community member also raised concerns that the commitment to school infrastructure in the area was not aligned with delivery.

Department’s comments

A preliminary staging plan and infrastructure delivery plan provide sufficient detail at this strategic planning phase to ensure infrastructure is provided at the appropriate time to support growth, identifying the stage of required infrastructure to support new homes and jobs in the precinct over the 20 year period as possible funding mechanisms. However, the staging plan and infrastructure delivery plan is high-level and based on preliminary cost estimates and further assessment is needed. The future rezoning will be supported by an infrastructure framework and strategic business case/s to confirm costs, lock in timing and funding sources and address the infrastructure funding gap.

We have made refinements to the place strategy, infrastructure delivery plan and supporting reports to address issues raised in submissions:

- Transport costs have been updated to bring them into line with recent changes in market pricing and the inclusion of lift and stairs for bridges to ensure they are compliant with accessibility requirements.
- Remediation costs have been refined to include costs for the ongoing management and embellishment of the wetland.
- We have clarified that conditions of consent are separate to council contribution plan items.
- We have clearly stated the need for strategic business cases to address the funding gap.

We have not included costs for sustainability measures because we consider developers will be responsible for this. Any measures in the public domain have been considered in embellishment costs.

As a result of the above changes, the total infrastructure costs exceed \$1.632 billion (previously \$1.5 billion). Identified developer and landowner funding mechanisms could provide around \$959 million (previously \$1.1 billion) over 20 years. This reflects a funding gap of around \$673 million (previously \$400 million).

Landowners' concerns have been noted and will be considered further as part of developing the future infrastructure framework to support any future rezoning. The key sites mechanism could be used in the redevelopment of sites in the precinct to provide growth-related infrastructure, particularly social infrastructure. As outlined in the infrastructure delivery plan, developers of residential accommodation will be given incentives through sufficient development yield, not density bonuses. For the key sites approach to work, it must be based on an assessment that verifies that the key site can be feasibly developed while absorbing the extra infrastructure costs. We will investigate this further as part of the part of the rezoning process and developing the infrastructure framework.

Collaboration between the department, agencies, local councils, landowners and industry is key to successfully delivering and funding infrastructure. The place strategy highlights this.

4.5.2 Utilities

Various comments were received from utility providers and agencies on the provision of utility infrastructure in the precinct. Comments included:

- confirmation about electricity network capacity and works required in the longer term to facilitate supply, such as augmentation to the existing zone substation and a potential new zone substation in the north-west of the town centre
- developers' responsibilities for arranging electrical reticulation and connection works
- the need for continued coordination between agencies and Endeavour Energy for major transport projects being delivered in the precinct
- the need for continued coordination with Sydney Water to ensure adequate provision and operation of any existing and new wastewater infrastructure.

Department's comments

The place strategy identifies the importance of collaborating with utility providers and developers to deliver adequate infrastructure, including investigating opportunities for large-scale solar and recycled water.

To recognise the importance of ongoing coordination between the department, utility providers, landowners and developers, we have included the following additional action under Strategic Direction 4 'Deliver high-quality place outcomes':

4.9 Continue to ensure adequate provision and operation of existing and new utility infrastructure

We have also made refinements to the utilities implementation report to address feedback.

4.5.3 Digital infrastructure

Council and agency submissions suggested further consideration be given to 'smart city' initiatives and highlighted the importance of this in attracting new businesses, enabling smart transport solutions, and delivering high-quality place outcomes.

Department's comments

We have made amendments to the place strategy and utilities implementation report to ensure due consideration of smart city initiatives, such as investigating the development of connectivity standards to attract high-technology uses and advanced manufacturing.

4.6 Place strategy process

Comments under this theme were received from all stakeholder groups and relate to the process undertaken by the department in creating the place strategy and its future implementation. It included comments on:

- engagement – the process undertaken to date and suggestions/requests for future engagement
- technical studies – those that support the place strategy, and for the next stages
- governance arrangements – both in the creation of the place strategy and to oversee and coordinate its implementation.

Several submissions emphasised the need for a coordinated approach and strong governance structure to lead the implementation of the place strategy, particularly for the delivery of infrastructure, and the strategy and management of contamination, flooding, and other risks.

Some submissions stated that issues such as flood management, contamination management and infrastructure funding and delivery should be either completely resolved or more advanced prior to the finalisation of the place strategy, rather than having these happen during the rezoning process.

Some submissions provided comments on specific elements of the technical reports that were exhibited along with the draft place strategy, and 2 submissions requested additional technical studies or additional analysis or strategic justifications.

Several submissions also emphasised that stakeholders must continue to be consulted and engaged in the project as it progresses through the rezoning process.

Department's comments

Many of the issues raised have been addressed through changes to the master plan, place strategy and supporting reports.

The place strategy is a strategic document that sets a framework for Camellia–Rosehill to play a role in addressing housing and employment demand across NSW over the next 20 years. The place strategy identifies that strong governance and collaboration between state agencies, council, landowners, developers and industry will be essential to successfully implementing the strategy.

The place strategy identifies that a precinct-wide approach to the rezoning is needed to ensure a coordinated approach across government to deliver good place outcomes and address the specific constraints that exist for future Camellia development. This includes:

- coordinating the preparation of an integrated transport study, flood risk study and plan and any other studies
- further developing the planning and design controls for the precinct
- undertaking further studies to confirm the provision, funding, delivery mechanisms and sequencing of infrastructure to ensure it is aligned with growth.

The place strategy also specifically states that site specific planning proposals will not be considered to make explicit that any future rezoning requires a precinct approach.

4.7 Development

Submissions were received by landowners, industry organisations, agencies, and council on development issues. Issues focussed on:

- staging
- development feasibility
- overall density, scale of development and development yield.

All these issues are interlinked and overlap with other themes, in particular infrastructure.

4.7.1 Staging

Key issues raised in relation to staging included:

- support for early development on less constrained sites
- the benefits of active and public transport linkages being delivered early and the need for further detail about how active transport could be facilitated, particularly along the foreshore

- requests that the staging plan specifically identify the primary school and the multipurpose hub in the early stages
- support for transport infrastructure solutions to be in place to ensure continued operations of existing businesses before any town centre development
- acknowledgment of the role that night-time venues could play in the early stages
- the need for further refinement of the timing and sequencing for infrastructure to ensure growth could be supported over time.

Council requested that the staging plan and sequencing approach clarify how:

- each of the sub-precincts will be staged over time (e.g., phasing of access/road connections and unlocking development in the Town Centre).
- many dwellings and/or jobs will be accommodated in each stage; and what specific infrastructure is required to support each stage of development

Department's responses

The place strategy provides a preliminary staging plan that sets out the staged delivery of land for new homes and jobs in the precinct and coordinates the delivery of infrastructure. We have made refinements to the staging plan to address submission issues. We have:

- referenced progressing development of the entertainment precinct (including night-time venues) in the short term, capitalising on existing entertainment facilities and connections to the Parramatta CBD
- identified need for planning and design of social infrastructure including a primary school and open space and works for such infrastructure in the short term to support early-stage development
- acknowledged residential development may commence not only on remediated sites but those with few constraints in the medium term, once the base infrastructure for the precinct is established
- identified the need for town centre enabling works, including district park and early community facilities in the medium term.

A new action (4.8) has also been included in place strategy to identify the need to establish arrangements for the remediation, dedication, embellishment, and long-term maintenance of the foreshore.

As outlined in section 4.5 of this report, we will confirm staging and timing of infrastructure as part of future work.

4.7.2 Density/Scale, yield and feasibility

There were varied views on density in the town centre. The community and council had concerns about the amount of housing, scale of development and adequacy of infrastructure required to support it.

Conversely, several landowners identified the need for more density/housing due to the impact the high costs for infrastructure and remediation and the requirement for affordable housing will have

on development feasibility. Landowners requested that the further consultation on feasibility be undertaken to ensure an equitable outcome.

An industry organisation requested that the department provide complete information about how it decided on the proposed number of dwellings in Camellia–Rosehill. It also called for us to work with industry to look at ways of removing constraints such as transport demand to allow increased densities.

Department's comments

The place strategy and supporting technical studies clearly set out the constraints that have dictated the cap on residential development (10,000 dwellings) and the necessary infrastructure (particularly sufficient social infrastructure) required to support this. The place strategy identifies potential floor space ratio and height controls to facilitate a maximum of 10,000 dwellings.

We have done further analysis to confirm that proposed land-use controls are feasible. We will consult with landowners and further assess feasibility as part of future rezoning and infrastructure development.

4.8 Amenity and land-use compatibility

Several agency submissions and one community submission raised concerns regarding amenity impacts in the precinct. Comments focused on potential impacts arising from conflict between the racecourse, industrial areas and the future residential area, with noise and odour impacts highlighted. Potential odour impacts on the town centre from the continued operation of Sewage Pumping Station 067 was also raised.

Some submissions stated that they did not believe amenity impacts had been sufficiently mitigated or resolved.

Department's comments

As part of the creation of the place strategy, we commissioned several reports to assess potential amenity impacts, including an air and odour implementation report and a noise and vibration implementation report. The reports were publicly exhibited with the draft place strategy. These reports demonstrate that amenity impacts can be managed through various mitigation measures.

Some measures have been built into the place strategy. This includes physical separation and buffers between different land uses, changes to land use that will see certain uses transition out, and road connections to redirect heavy vehicles away from residential areas.

Some mitigation measures will be implemented through existing controls and legislative requirements that apply to certain commercial, and industrial operations.

Mitigation measures will be further investigated and implemented as part of developing controls to support the future rezoning as well as the development application process. These measures will build on the findings of the technical studies to deliver additional controls and measures. For example, buffers from Sewage Pumping Station 067 have been defined to mitigate against odour

issues and the use of a remediation staging and sequencing framework and staging controls will avoid land use conflicts.

We have included an additional action (Action 4.4) in the strategy to identify further consultation with Sydney Water to investigate additional measures to mitigate odour from Sewage Pumping Station 067. Accordingly, the exact odour buffers and additional mitigation measures will be determined as part of the rezoning and development stages.

Amenity issues have been considered in appropriate detail for the strategic-level place strategy. Further investigation of precise controls will be implemented as part of the rezoning process.

Staging of development and consultation with landowners will be critical in ensuring that conflicts can be managed into the future. The place strategy identifies as an action (Action 4.3) that the department, City of Parramatta Council and the EPA will need to work with business and landowners to ensure odour and air emission issues can be mitigated to meet the future requirements and minimise the potential for land-use conflicts.

4.9 Urban design

A small number of submissions from community members, landowners, and agencies provided comments in relation to the urban design of the precinct.

Some comments related to specific elements of the urban design that submitters felt hadn't been addressed or needed greater resolution. These included the management of a stormwater easement adjoining their site, controls to reduce the visual and environmental impacts of industrial buildings (green roofs and street plantings were suggested), the scale of building podiums, and that there should be a consistent street edge to the foreshore land (not just along the section of the town centre core).

Other comments raised concerns about the viability and design of the built form shown on the indicative concept plan maps included in the draft place strategy and integrated master plan documents.

Department's comments

Comments relating to specific urban design elements have been noted and where appropriate we have updated the master plan to address the matters.

The built form shown in the draft place strategy and master plan was indicative and provided an example of potential built-form outcomes for sites. Built-form information (layouts) has now been removed from the place strategy and master plan. Built form and supporting controls will be investigated in more detail as part of the rezoning process.

4.10 Connecting with Country

A submission was made by the Dharug Strategic Management Group a not-for-profit company and registered charity that operates as an organisation for Dharug people (yura).

Comments were also made that the place strategy should begin, end and be accountable to Country (nura). This should be about Burramattagal Nura (country), not GPOP and not Camelia-Rosehill.

This group has not been involved in the preparation of the draft place strategy but identify that they are ready to participate in the proposed Community Reference Group and to actively lead and support action to heal and care for Dharug Nura (country), this precious place.

The group commented that the Vision was positive but raised concerns that the implementation of the place strategy will not enable true empowerment and agency of Aboriginal people and organisations. Instead, Aboriginal involvement would be reduced to tokenistic acknowledgement. There was also a submission from a community member that raised similar concern.

The submission also highlighted the resourcing pressures on Aboriginal organisations, and that it is unreasonable that responses can be volunteered, particularly within tight timeframes.

Department's comments

We believe the involvement of Aboriginal stakeholders is critically important and the results of their involvement must be clear, concrete and meaningful. Tokenism is recognised as a risk. We seek to mitigate it by establishing protocols and practices to ensure that consultation is extensive and has impact, and that there is clear government and industry commitment to ensuring Connecting with Country activities are meaningfully continued beyond the place strategy.

The engagement process to date has been substantial and follows all best-practice considerations, including the Government Architect NSW's Connecting with Country Draft Framework. Outcomes and recommendations from the engagement process have been embedded in the place strategy, including that a community reference group be established. The group will have appropriate terms of reference and consideration of cultural protocols and be in a position of influence over the process. However, this may be integrated with current consultative arrangements.

The place strategy has been updated throughout to recognise this is nura (country) of the Burramuttagal yura (people).

Additionally, we recognise and agree that the time and expertise that Aboriginal stakeholders bring and the cultural knowledge they provide has value. Payment for that time and expertise demonstrates a respect for that knowledge. Aboriginal stakeholders involved in the Connecting with Country process so far have been paid for their time and expertise.

4.11 Economy and employment

Several submissions from industry, community members, council and agencies commented on the economic and employment aspects of the place strategy.

Submissions supported the proposed measures to increase employment and economic activity in the precinct. An industry organisation and landowners identified the importance of prioritising and enhancing the employment areas of the precinct, and for the proposed density to be increased to facilitate higher employment than proposed.

Landowners identified their retail aspirations for their sites and identified the need for more floor area to meet these.

Council identified the need for the place strategy to further enhance and highlight the role of the night-time economy and provide controls to enable this.

Department's comments

We have made amendments to proposed planning controls to enable greater density for industrial developments, as detailed in section 4.4 of this report.

The proposed town centre has been planned to provide retail development that will service the residential and employment population of Camellia. We do not envisage the retail area will support sub-regional retail needs. A new action (Action 2.4) has been included in the place strategy to identify that there may need to be further analysis of the retail demands of the precinct through the rezoning process.

We have also made several changes to the place strategy that further emphasise the importance of planning for the night-time economy.

4.12 Housing

Comments on housing were focussed on diversity and affordable housing provision.

Most of the feedback was from council, which wanted:

- more detail on the desired housing typologies for the precinct
- recognition that student housing near amenities could contribute to the night-time economy, establishment of innovation spaces and future partnerships between industries and universities
- to include principles to guide the location of affordable housing
- mandatory provisions for affordable housing to be provided in perpetuity
- more than 5% affordable dwelling (preferably 10%), in alignment with council's Affordable Housing Policy 2019.

There was concern from some landowners about the requirement for affordable housing impacting feasibility.

Business Western Sydney identified the need for the department to continue to work with industry to provide planning controls that give a diverse mix of housing and tenure types.

A community member was of the view that a minimum 5% affordable housing was inadequate, and the target should be at least 10–15%.

Department's comments

Direction 4 of the place strategy and associated principles, actions and planning controls have been strengthened in respect of housing diversity and affordability.

A variety of housing typologies will be provided to give residents flexibility to choose the best form of housing for them. Specific typologies and tenure types (5-10% affordable housing, build-to-rent, co-living, student housing and a mix of apartment types) will be investigated as part of developing planning controls during the rezoning process. Opportunities for collaboration and consultation with stakeholders on this will occur as part of the process.

A minimum of 5% affordable housing will be required and where viable a higher target will be investigated in line with the *Greater Region Plan – A Metropolis of Three Cities*. We will undertake further assessment of feasibility of affordable housing as part of the future rezoning and developing the infrastructure framework.

4.13 Hazard risk

A strategic qualitative risk assessment report (land use safety study) has been prepared to support the place strategy and master plan to ensure the proposed:

- land uses and their distribution are consistent with the hazards and associated risks from Ampol's fuel pipeline running along Grand Avenue and Viva Energy fuel storage terminal located in the precinct
- number and location of people residing or working in the precinct are consistent with the population thresholds that are defined by the precinct risk profile.

The master plan complies with all risk criteria defined, incorporating:

- the separation distance from potentially hazardous industrial facilities
- the separation distance from the fuel pipelines
- population limits on development in the precinct, especially in the pipeline 'consequence affected zone' (within 130 metres from the fuel pipeline).

Several landowners raised concerns about technical aspects of the land use safety study and the associated limitations on residential development, particularly within the hazard consequence zone. Landowners commented on:

- the absence of detailed assumptions
- concerns about the approach to certain aspects of the modelling such as assumed pool fire size, building materials used, allocation of population to the ground level

- the need for clarification about how the numbers of population per block of land figures were arrived at.

Department's comments

A conservative approach has been applied, given that this is a strategic-level study, and there are certain factors that aren't known at this stage, such as the materials.

We have included detailed assumptions in the hazard risk implementation report. We have done further sensitivity analysis as part of the qualitative risk assessment to assess how differences in assumptions identified in the submissions could affect the outcomes. We found there was negligible impact on the results.

The population contours identified in the study are dictated by a range of constraints, including but not limited to hazard risk. Populations numbers were determined based on advice regarding the number of people who could safely reside/work within the hazard area. This population was proportionately allocated across the sites. We have updated the integrated master plan to provide further detail about how we arrived at the numbers of population per block of land figures.

4.14 Heritage

Two submissions provided comments relating to heritage – one from a community member and the other from the council. The community submission supported the measures proposed in the place strategy regarding heritage protection. The submission from council emphasised the need to protect heritage items in the precinct and provided specific comments regarding recording, management and protection protocols in relation to Aboriginal and non-Aboriginal archaeological materials that may be found in the precinct.

There was also a heritage item missing from the heritage implementation report – Rosehill Station footbridge located on racecourse land – that is listed under Transport for NSW's heritage register.

Department's comments

We have reviewed and strengthened wording in the 'Vision' and 'Strategic Direction 1' sections of the place strategy to further emphasise the importance of protecting heritage in the precinct.

The Aboriginal cultural heritage implementation report has been refined in response to council's comments.

The heritage implementation report and master plan have been updated to include the Rosehill Station footbridge.

5 Amendments made after exhibition

5.1 Master plan amendments

The key changes made to the master plan figures in response to consultation include the following:

- Changes have been made to open space to improve access and increase provision of open space, particularly for the town centre. Overall open space across the precinct has increased from 43.7 hectares (13.6%) to 54.5 hectares (16.9%).
- Residential density in the north west now accommodates local open space and has been reallocated to the mixed-use entertainment precinct.
- The existing horse stables on Australian Turf Club land is now identified as the preferred location for the K–12 school instead of the surplus Metro land (previously also identified as an option). The bus route has also been updated to service the K–12 school site.
- The surplus Metro land is now required for flood storage associated with Sydney Metro’s Clyde Stabling and Maintenance Facility and will accommodate district open space subject to further review of Sydney Metro’s operational requirements.
- The description of the primary and high school sites has changed from ‘Proposed primary and high school’ to ‘Investigation site for educational facilities – subject to further review’. This is to recognise that further work is needed to confirm the suitability of these sites.
- The potential M4 connection from Unwin Street is more clearly identified as a transport initiative to be further investigated. Further design analysis has been undertaken that demonstrated that a connection is possible subject to design changes to be negotiated with Sydney Metro and further assessment of impacts such as flooding and transport as part of future work.
- Indicative locations for decoupled parking have been removed to provide more flexibility for decoupled parking to be integrated with the future design of buildings.
- Parramatta Light Rail Stage 2 routes have been aligned with latest work by Transport for NSW. Two routes are being investigated, both of which run through Camellia.
- Indicative built forms have been removed as they will be subject to further testing and modelling through the rezoning process.

5.2 Place strategy amendments

The key changes made to the place strategy in response to consultation include the following:

- Figures have been changed in response to the master plan changes and where they align with the overall vision and intent of the strategy.
- The strategy now targets net zero emissions by 2040 (earlier than the state target of 2050), which is achievable for a new and well-designed precinct like Camellia.
- The following additional actions were included:
 - Action 2.4 – Investigate the need for further retail demand assessment as part of the rezoning in response to comments from landowners seeking additional retail at their sites. Retail has been limited to a scale that supports future residents and workers of the area.
 - Action 4.2 – Prepare a public domain strategy to support future rezoning that will specify design requirements, provide an activation framework for public spaces and a delivery plan for enabling digital connectivity and infrastructure.
 - Action 4.4 – Undertake further consultation with Sydney Water to investigate additional measures to mitigate odour from Sewage Pumping Station 067 and confirm the exact odour buffers as part of the rezoning and development stages.
 - Action 4.8 – Establish arrangements for the remediation, dedication, embellishment and long-term maintenance of the foreshore as part of future development applications.
 - Action 4.9 – Continue to ensure adequate provision and operation of existing and new utility infrastructure to recognise the importance of ongoing coordination between the department, utility providers and landowners and developers.
 - Action 5.18 – Continue to consult with NSW State Emergency Services and other emergency services authorities to obtain their advice on flooding and access requirements.
- Action 4.5 has been amended to identify that the department will continue investigating the suitability and size of available surplus land at the Clyde Stabling and Maintenance Facility for district open space considering Sydney Metro’s operational requirements.
- Action tables have been updated to identify organisations responsible to lead and those supporting the delivery.
- Proposed floor space ratio controls for the urban services sub-precinct and for heavy industrial land south of Devon Street have been increased from 1:1 to 1.5:1 and height controls removed to allow for multistorey warehouse development. This has increased projected jobs from 14,500 to 15,400.
- The entertainment precinct will be zoned ‘Mixed use’ (instead of RE2 private recreation) or ‘SP3 Tourist’.
- Updates have been made to reflect total infrastructure costs exceeding \$1.63 billion (previously \$1.5 billion). Identified developer and landowner funding mechanisms could provide around \$959 million (previously \$1.1 billion) over 20 years. This reflects a funding gap of around \$673 million (previously \$400 million). The changes were in response to a review of transport and remediation costs, inclusion of the management of the wetland and embellishment costs, as well as changes to the master plan.

- The staging plan has been refined to identify need for social infrastructure including a primary school to be planned and delivered early to support development, recognition that development may occur on sites with few constraints, once the base infrastructure for the precinct is established and opportunity to progress development of the entertainment precinct (including night-time venues) in the short term.
- Land-use tables have been removed from the appendices of the place strategy to ensure the document’s currency –the employment reforms framework is on exhibition.

5.3 Amendments to supporting technical studies

Supporting reports have been updated to align with revised master plan and place strategy changes as well as to respond to key submission issues. A summary of the key changes to each of the reports is outlined in Table 5.

Table 5: Changes to supporting reports

Supporting report	Key changes
Integrated master plan	<ul style="list-style-type: none"> • Updated to align with revised master plan, place strategy and changes to technical reports • Other changes include: <ul style="list-style-type: none"> ○ built form information removed and confirmation that built form will be informed by more detailed flooding and transport studies ○ strengthened principles and design considerations ○ need for further investigation of housing typologies ○ further detail about how numbers of population per block of land figures were arrived at.
Aboriginal cultural heritage assessment – implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Recommendations in the executive summary and conclusion have been updated to clarify that future management of the 2 Aboriginal archaeological sites located within the precinct will be consistent with the requirements of the <i>National Parks and Wildlife Act 1974</i>.
Air and odour implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Odour modelling updated to address Sydney Water feedback and acknowledge that further consultation is required with Sydney Water to investigate additional measures to mitigate odour from Sewage Pumping Station 067 and confirm odour buffers.
‘Connecting with Country’ implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes. • No other changes in response to submission issues

Supporting report	Key changes
Ecological implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes. • Other updates include: <ul style="list-style-type: none"> ○ clarity on required riparian vegetated buffers to be protected or re-established, and permitted activities ○ inclusion of mapping of wetlands, updated to show protections under other legislative instruments ○ strengthened wording to address the department’s Environment and Heritage division comments.
Economic analysis and implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Advice included on the need for higher density in employment areas and further retail assessment
Heritage implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Updated to include missing heritage item ‘Rosehill Station footbridge’ located on racecourse land that is listed under Transport for NSW’s heritage register.
Infrastructure delivery plan	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes. • Other changes include: <ul style="list-style-type: none"> ○ inclusion, embellishment and ongoing management of wetlands ○ clarifying that strategic business cases are required to fund infrastructure gap ○ clarification that conditions of consent are separate to council contribution plan items ○ used updated transport costs to take in account recent changes in market pricing and address Transport for NSW comments regarding station upgrades and other cost increases.
Integrated water management strategy implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes. • Other changes include: <ul style="list-style-type: none"> ○ probable maximum flood modelling completed ○ strengthened wording to address the department’s Environment and Heritage division, Sydney Water and council’s comments ○ acknowledgement that further consultation with NSW SES and other emergency services authorities to obtain their advice on approach to flood and access requirements.
Landscape implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes. • Other changes include: <ul style="list-style-type: none"> ○ additional indicative locations for playgrounds ○ multi-use courts and sporting field identified ○ inclusion of indicative concept designs of district parks.

Supporting report	Key changes
Noise and vibration implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan, and place strategy changes • No other changes in response to submission issues.
Qualitative risk assessment report (hazard risk and land use safety report)	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Other changes include: <ul style="list-style-type: none"> ○ inclusion of detailed assumptions ○ sensitivity analysis to assess the variations in assumptions.
Remediation implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Other changes include: <ul style="list-style-type: none"> ○ further detail on the durability of certain remediation measures, such as capping, and experience of other urban renewal precincts to inform the formulation of the remediation staging framework ○ inclusion of the wetlands in the scope of future contamination protocols and the need for further consultation with the EPA regarding future management ○ clarity on ongoing contamination management costs ○ refinement of wording in response to Environmental Protection Agency comments.
Sustainability implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan and place strategy changes • Identifies how net zero emission can be achieved by 2040 (earlier than the state target of 2050), strategies to increase support for electric vehicles, and more emphasis on the opportunities for the development of the circular economy and sustainable materials in the precinct
Social infrastructure implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan, place strategy changes, including: <ul style="list-style-type: none"> ○ updated benchmarking (due to population change) and all corresponding numbers ○ further analysis of public open space provision ○ confirmation of a multipurpose community hub (minimum 4,300 m²) in the town centre.
Utilities infrastructure implementation report.	<ul style="list-style-type: none"> • Updated to align with revised master plan, place strategy changes • Refinements have also been made to the utilities implementation report to address feedback from utility providers, agencies and council including: <ul style="list-style-type: none"> ○ due consideration of ‘smart city’ Initiatives ○ confirmation of electricity network capacity and works required in the longer term to facilitate supply ○ developers’ responsibilities for electrical reticulation and connection works ○ need for continued coordination between agencies and Endeavour Energy for major transport projects being delivered in the precinct ○ need for continued coordination with Sydney Water to ensure adequate provision and operation of any existing and new wastewater infrastructure.

Supporting report	Key changes
Traffic and transport implementation report	<ul style="list-style-type: none"> • Updated to align with revised master plan, place strategy changes such as provision of K-12 school and decoupled parking • Other changes include: <ul style="list-style-type: none"> ○ clarifications, such as for the use of care share schemes ○ changes to ensure freight and heavy movements are adequately planned for and addressed ○ use of Kingsford as the benchmark suburb – it is serviced by light rail and buses but no heavy rail. Residents of Kingsford have been deemed to have a similar level of public transport choice available to them as may be expected in Camellia–Rosehill

6 Strategic Alignment

This section outlines the existing strategic planning framework that has informed the Department's review of the precinct's existing planning controls within the wider strategic context of Greater Parramatta and Greater Sydney.

6.1 Future Transport Strategy 2056

The *Future Transport Strategy 2056* (Transport for NSW, 2020) provides an integrated, 40-year vision for the NSW transport system. The strategy outlines a vision, strategic directions and customer outcomes, with infrastructure and services plans underpinning the delivery of these directions across the state. The strategy works with the Region and District Plans and aims to deliver integrated solutions to transport with access to jobs and services within 30 minutes. A focus is on the role of transport in delivering movement and place outcomes that support the character of the places and communities of the future.

The strategy also reinforces the commitment to major infrastructure projects, including the Parramatta Light Rail, which passes through the precinct. Stage 1 of the light rail is under construction, with passenger services expected to begin in 2023. Planning and development of Parramatta Light Rail Stage 2 is underway, with two routes being investigated that have the potential to service the north-eastern area of the precinct.

The Camellia-Rosehill Place Strategy supports Future Transport Strategy 2056 by providing framework to capitalise on investment and opportunities created by new transport infrastructure including Parramatta Light Rail Stage 1 and 2, and Sydney Metro West.

6.2 Greater Sydney Region Plan

The *Greater Sydney Region Plan* (Greater Sydney Commission², 2018) establishes a 40-year vision to 2056 for Greater Sydney to be a metropolis of three cities, where most residents live within 30 minutes of their jobs, education and health facilities, services and recreation places.

It also sets the planning framework for the five districts that make up the Greater Sydney Region. Camellia-Rosehill is located in the Central City district.

The Greater Sydney Region Plan identifies the strategic importance of the Greater Parramatta to Olympic Peninsula (GPOP) Economic Corridor and the role of the Camellia-Rosehill precinct within this corridor. It reiterates the GPOP Vision and envisions the Camellia-Rosehill precinct will be renewed comprising a 'Next Generation Living' area in the north-west corner of the precinct, being medium to high density residential with nearby education, research, retail, recreation and entertainment facilities providing all the conveniences of 'inner-city' living, with the remainder of

² Now the Greater Cities Commission

the precinct being an employment hub of ‘Essential Urban Services, Advanced Technology and Knowledge Sectors’.

The plan also highlights the importance of infrastructure investment and the need for this to be aligned to support growth, as well as the need for collaboration across government, agencies, businesses and the community to deliver on the GPOP Vision.

The Camellia-Rosehill Place Strategy is aligned with vision and directions and will support it being achieved.

6.3 Central City District Plan

The *Central City District Plan* (Greater Sydney Commission, 2018) provides a guide for implementing the *Greater Sydney Region Plan* at a district level and acts as a bridge between regional and local planning. The District Plan establishes planning priorities and actions to guide planning in the Precinct. In relation to the Camellia-Rosehill precinct, the District Plan:

- reconfirms the precinct as an area for both Next Generation Living, and employment in the Essential Urban Services, Advanced Technology and Knowledge Sectors.
- it also more specifically identifies opportunities to evolve Camellia-Rosehill into a high-productivity precinct, with a focus on coexisting water, energy and transport uses generating a range of employment types, including highly skilled jobs, as well as retention of urban services industries.
- identifies that industrial and urban service land within Camellia is to be reviewed and managed.
- links parks, bushland, playgrounds and waterways through the Greater Sydney Green Grid, with enhanced opportunities for safe walking and cycling paths – Parramatta River and Duck River are identified as district green grid priorities for the Central City.

The place strategy will deliver on many of the priorities and actions identified in the district plan such as a precinct supported by infrastructure (both physical and social), providing housing supply, choice and affordability with access to jobs, services and public transport, creating and renewing places and growing a stronger and more competitive GPOP Economic Corridor through the protection of employment land. It also delivers on a number of green grid and sustainability priorities.

6.4 Place Based Infrastructure Compact

The GPOP Place-based Infrastructure Compact Pilot (Greater Sydney Commission, November 2019) (PIC) was a piloted new collaborative model that was identified in the Region Plan to deliver the GPOP economic corridor.

The PIC model assessed infrastructure needs and costs, identifying scenarios and recommending sequencing for the delivery of infrastructure to support growth.

The Greater Sydney Commission submitted final recommendations to the NSW Government in March 2020 which recommended that Camellia be retained for urban service land, however, noted

the Government may proceed with the town centre (in its current or an amended form) once the broader issues including the costs of infrastructure, economic and social benefits have been further considered.

The place strategy has been prepared in line with the NSW Government response to the GPOP PIC recommendations (December,2020). That is, that a coordinated and strategic approach was needed to consider changes to land use, address remediation, transport challenges, land use conflict through the preparation of a place strategy.

6.5 GPOP Vision

The *GPOP Vision* (Greater Sydney Commission, 2016) established the strategic intent for the GPOP Economic Corridor to become the Central City's connected and unifying heart. It was the first of the Commission's strategies to identify the four distinct quarters of the GPOP Economic Corridor, being:

- Parramatta CBD and Westmead Health and Education Precinct
- Next Generation Living
- Essential Urban Services, Advanced Technology and Knowledge Sectors
- Sydney Olympic Park Lifestyle Super Precinct.

The GPOP Vision set out 12 Directions to drive the vision, those of relevance to Camellia-Rosehill include:

- 5 - Transform Camellia, Rydalmere, Silverwater and Auburn into 21st Century essential urban service, advanced technology and knowledge assets
- 8- Deliver a rich mix of housing to create inclusive and diverse 'inner-city' liveability across GPOP, to attract and retain talent
- 9 - Adopt a 5-10 percent (subject to viability) affordable rental housing target for nominated urban renewal areas for very low to low income households
- 10 - Stimulate engagement with Parramatta's rich history and development of cultural assets, and celebrate the extraordinary diversity of people in our city's central heart
- 11- Make Parramatta River a great living waterway and connector, where people enjoy walking, cycling and safe swimming
- 12 - Shape attractive and effective built environments and public spaces that reflect a focus on great urban design and environmental excellence.

As discussed above, the Camellia-Rosehill precinct falls within two of these precincts – Next Generation Living in the north-west corner of the precinct, and Essential Urban Services, Advanced Technology and Knowledge Sectors in the remainder of the precinct.

The place strategy is consistent with this vision and provides a framework for implementation of the relevant directions

6.6 Greater Parramatta Interim Land Use and Infrastructure Implementation Plan

The *Greater Parramatta Interim Land Use and Infrastructure Implementation Plan* (Department of Planning and Environment, 2017) was developed by the department to deliver on the GPOP Vision and is implemented through Section 9.1 Ministerial Direction 1.7. It accordingly carries across the designation of a 'Next Generation Living' area in the north-west corner of the precinct, with the remainder being an employment hub of 'Essential Urban Services, Advanced Technology and Knowledge Sectors'.

Specifically, the plan envisions that the precinct will provide 10,000 dwellings and around 13,150 jobs (+8,850 jobs from 2016 levels).

The place strategy is consistent with the intended number of dwellings, and exceeds the number of jobs, proposing to deliver capacity for a total 15,400 jobs (+11,100 jobs from 2016 levels).

6.7 Parramatta Local Strategic Planning Statement 2036

The *Parramatta Local Strategic Planning Statement City Plan 2036* (City of Parramatta Council, 2020) sets out a 20-year land use planning vision for Parramatta LGA. It came into effect on 31 March 2020. The *Parramatta Local Strategic Planning Statement* (PLSPS) identifies a number of key strategic elements that relate to the Camellia-Rosehill precinct:

- the Camellia–Rosehill precinct is projected to increase by 3,500 dwellings and 5,000 jobs by 2036 (with acknowledgement that this is subject to the NSW Government's response to the GPOP Place-based Infrastructure Compact recommendations).
 - In the City of Parramatta Council's *Local Housing Strategy* (2020), which is a local strategy that supports the PLSPS and is where these dwelling figures are sourced, a total increase of 10,000 dwellings is projected in the Camellia–Rosehill precinct, with 3,500 dwellings to be delivered by 2036, and the remaining 6,500 to be delivered beyond 2036.
- the employment lands cluster at Silverwater, Camellia, and Rydalmere are maintained and transitioned to employment uses that meet contemporary needs and provide higher order jobs and increased employment density.
- Camellia is identified as a Growth Precinct, and a Proposed Local Centre.

The PLSPS also identifies a number of Council Policy Directions and Actions that support the achievement of Council's strategic vision for the Camellia-Rosehill precinct.

The place strategy is consistent with, and will enable the achievement of, the vision set out in the PLSPS.

Appendix A Response to Public Submissions

Finalisation report for the Camellia–Rosehill Place Strategy

The department has provided a response to all submissions received on the draft Camellia–Rosehill Place Strategy as well as social pinpoint comments. The table includes the submission comments and the department’s response, with submissions grouped by stakeholder category.

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Social Pinpoint Comments

Table 6: Responses to Social Pinpoint Comments

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
1	General comment	Endeavour Energy Switch Station No. 28370 at 2A Grand Avenue Rosehill (Lot C DP 334265). Surrounding development should adopt 'prudent avoidance' principles to avert the possible risk to health from exposure to emissions form electricity infrastructure such as electric and magnetic fields (EMF) and noise.	0	0	Development near electricity network assets, including substations, will be carefully located, designed, and constructed in accordance with all relevant requirements and guidelines to ensure safety.
2	General comment	Endeavour Energy Camellia Transmission Substation at 7 Devon Street Rosehill (Lot 1 DP 507363). Surrounding development should adopt 'prudent avoidance' principles to avert the possible risk to health from exposure to emissions form electricity infrastructure such as electric and magnetic fields (EMF) and noise.	1	0	See response to comment above.
3	General comment	Endeavour Energy Rosehill Zone Substation at 12 Unwin Street Rosehill (Lot 1 DP 432966). Surrounding development should adopt 'prudent avoidance' principles to avert the possible risk to health from exposure to emissions form electricity infrastructure such as electric and magnetic fields (EMF) and noise.	2	0	See response to comment above.
4	General comment	Has there been consideration of the impacts of increased heavy freight vehicle movement on the residential area between Stubbs Street and Silverwater Road? Given the existing B double route access on James Ruse Drive connecting to Silverwater Road via M4 and to Victoria Road, the rationale for a new road bridge here is not well founded.	0	0	High level strategic modelling and analysis has been undertaken as part of the traffic and transport implementation report that supports the place strategy. All transport initiatives will be investigated further in the next stage of the process as part of the integrated transport study. Refer to

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
					Section 4.1 of this report for further detail.
5	General comment	Suggest limiting direct access to Camellia from this bridge to only non-car-users/transport/emergency vehicles. It is difficult to facilitate mode shift behaviour from cars if cars have same level of direct access as non-car alternatives (refer to 'ontvlechten' concept in Dutch transport planning). In particular this road goes through potential school site and town centre in which allowing more cars to pass through only hinders activation of street life.	2	0	Noted. All proposed transport initiatives including detailed matters such as access arrangements of the proposed new road connections will be investigated as part of the integrated transport study. Refer to Section 4.1 of this report for further detail.
6.0	General comment	Carnarvon road is already busy. Nice to think you can just dump traffic into neighbouring areas. This is not good enough.	1	1	High level strategic modelling and analysis has been undertaken as part of the traffic and transport implementation report that supports the place strategy. The integrated transport study will confirm new and improved transport infrastructure that needs to be delivered to support the renewal of the precinct, as well as mitigate any impacts to surrounding areas. Refer to Section 4.1 of this report for further detail.
6.1	General comment	Silverwater is not just an industrial suburb. There is quite a decent residential area as well. It can be a nightmare at peak times getting in and out of here now I can only imagine how bad it will be with 2 to 3 times more trucks using Carnarvon Road.	0	0	It is acknowledged that Silverwater is not only an industrial suburb. The integrated transport study will confirm new and improved transport infrastructure that needs to be delivered to support the renewal of the precinct, as well as mitigate any impacts to surrounding

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
					areas. Refer to Section 4.1 of this report for further detail.
6.2	General comment	This bridge will only provide easy access to Camellia and future residents and Silverwater to Parramatta.	0	0	As part of the next stage of the process, the bridge over Duck River, along with all other proposed transport initiatives will be investigated as part of the integrated transport study. This study will ensure that the final set of transport initiatives are the best options for both the Camellia-Rosehill precinct and the surrounding areas, including Silverwater. Refer to Section 4.1 of this report for further detail.
7	General comment	Hi there, what are the timelines for the remaining station PIC precinct plans?	0	0	<p>Transport planning is the responsibility of Transport for NSW. Inclusion of a station in Camellia was considered as part of the planning for Sydney Metro West and ruled out due to environmental constraints.</p> <p>The Department and City of Parramatta Council are responsible for strategic planning in the area with projects underway in Parramatta CBD, Westmead and Camellia.</p>
8.0	General comment	Please confirm if Parramatta Light Rail Stage 2 is funded and when it will be built? Residential developments in Camellia, Melrose Park & Wentworth Point badly require public transport options other than cars which will cause further gridlock on arterial roads.	50	0	The NSW Government has committed \$602.4 million towards Parramatta Light Rail Stage 2 to start works and commence a detailed planning process. The funding will go towards early works and building the vital bridge connection across the Parramatta River between

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
					Wentworth Point to Melrose Park. Refer to Section 4.1.2 of this report for further detail.
8.1	General comment	Needs a heavy rail connection from Camellia to Heavy Passenger Rail at Clyde Station with Camellia used as a terminus from Westmead and Parramatta.	0	0	Parramatta Light Rail Stage 1 will provide a high-frequency, high-capacity connection between the precinct and the Parramatta CBD, which provides connections to a number of heavy rail train lines at Parramatta Station, and the future Sydney Metro West, currently under construction. Refer to Section 4.1.2 and 4.1.6 of this report for further detail.
9	I like...	This is my preferred route for the light rail.	35	51	The place strategy has been updated to include the latest Parramatta Light Rail proposed alignment. This feedback is noted and has been provided to TfNSW for their consideration. Refer Section 4.1.2 of the Finalisation Report for further detail.
10	I like...	I like the idea of building two bridges to connect the area with Rydalmere as well as the Silverwater area. It will definitely build solid foundation for other improvement and support the development of the area.	1	0	This feedback is noted.
11	I like...	This is my preferred route for the light rail.	27	52	The place strategy has been updated to include the latest Parramatta Light Rail proposed alignment. This feedback is noted and has been provided to TfNSW for their consideration. Refer Section 4.1.2 of the

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
					Finalisation Report for further detail.
12.0	Ideas and suggestions	Can we please make a Metro stop a Rosehill racecourse? The eastbound commuters will need to travel away from the city and change transport modes in order to access the Metro, even though it goes directly under the site. Given the proposed number of residents and workers and the transport hub around the PLR junction, surely there is a strong case for a station. Especially when we are inviting more people here. metro station could catapult the growth.	14	0	The NSW Government investigated the potential for a station at Camellia as part of the strategic planning for Sydney Metro West. The government decided that a station will not be progressed at Camellia due to identified environmental constraints. The Parramatta Light Rail will significantly improve transport access to and from the precinct, with frequent and reliable services to Parramatta CBD and Sydney Olympic Park. Refer Section 4.1.2 and 4.1.6 of this report for further detail.
12.1	Ideas and suggestions	Rosehill station return due to the growing number of residential buildings	3	0	Parramatta Light Rail Stage 1 will provide a high-frequency, high-capacity connection between the precinct and the Parramatta CBD, which provides efficient connections to a range of additional transport options. Refer to Section 4.1 of this report for further detail.
12.2	Ideas and suggestions	Yes, a station at Rosehill makes sense, as the trains must surface here for their maintenance. It is easy to build a station above ground and the trains must stop here anyhow. Maybe the frequency won't be very good, but it's better than nothing	0	0	The NSW Government investigated the potential for a station at Camellia as part of the strategic planning for Sydney Metro West. The government decided that a station will not be progressed at Camellia due to identified environmental constraints. The Parramatta Light Rail will significantly improve transport access to and from

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
					the precinct, with frequent and reliable services to Parramatta CBD and Sydney Olympic Park. Refer Section 4.1.2 and 4.1.6 of this report for further detail.
12.3	Ideas and suggestions	Yes absolutely! We need a metro stop to join the metro service to the light rail service and connect the east-bound metro lines (at least until the Metro stage 2 is complete). Please consider reinstating a Rosehill/Camelia Metro station!	0	0	See response to comment above.
13	Information	I would like to see high rise options available right throughout the area an eco-design environmentally friendly urban option in addition to Parramatta's development contrasting medium level residential options making the most of the height allowances now available in Parramatta - creating a hub for creative cafes and restaurants a central verb that would add more to the ambiance of the racecourse and business opportunities.	1	0	Camellia-Rosehill place strategy provides for high density development in the town centre. This comprises town centre (high) area with floor space controls 5.5:1 and heights up to 130m and what is identified as town centre (medium) with floor space ratio controls of 4.5:1 with heights up to 80m. The floor space and height is lower in the medium area as it is constrained being located within the hazard risk consequence zone. Refer Section 4.7.2 and 4.1.3 of this report for further detail.
14	Information	My foresight for this project was to create a Happy Valley (Hong Kong) style racecourse at Rosehill Gardens by developing the surrounding areas and redeveloping the heavy industrial across the site with business and residential towers this would benefit the options for property development and promote growth for entertainment purposes within the precinct.	2	1	The place strategy provides a balanced approach in maintaining employment hub while enabling the renewal of the precinct considering the constraints and opportunities. High rise development will be permitted in the active town centre and entertainment sub precinct.

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
17	Information	An additional Metro station should be developed in this part of the Camellia Peninsula to ensure transport options exist for workers both here and Silverwater (across Duck Creek) as well as those living in redevelopment on the other side of waterways such as Ermington, Melrose Park and Newington. Good pedestrian bridges to all these sites would really entice active transport use and decrease traffic generation around Silverwater Road. The flat topography of the region is perfect for this.	0	0	The NSW Government investigated the potential for a station at Camellia as part of the strategic planning for Sydney Metro West. The government decided that a station will not be progressed at Camellia due to identified environmental constraints. Increasing walking and cycling connections to surrounding areas is a key focus for the place strategy, and a number of connections are proposed. These will be investigated in detail as part of the rezoning process. Refer Section 4.1 of the Finalisation Report for further detail.
18	Information	Should include Silverwater in this plan and a metro station there too. You keep skipping Silverwater and developing transport around it. Good luck driving anywhere around here when all this is built. It takes 30 minutes to turn from Parramatta Road onto James Ruse Drive in the mornings because no one wants to pay tolls everywhere. So much to fix.	0	0	The NSW Government investigated the potential for stations as part of the strategic planning for Sydney Metro. The place strategy proposes a number of initiatives to improved traffic conditions in and around the precinct. All transport initiatives proposed in the place strategy will be investigated in the next stage of the process through an integrated transport study. The integrated transport study will confirm new and improved transport infrastructure that needs to be delivered to support the renewal of the precinct, as well as mitigate any impacts to surrounding areas. Refer to Section 4.1 of this report for further detail.

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
19	Information	Industrial precinct may be relocated to further down to the west in consideration to the dust and noise	0	0	The location of various land uses was considered during the preparation of the place strategy. A mixed use town centre has been located away from heavy industry to minimise the potential for land use conflict, including dust and noise impacts. Studies on noise and dust impacts were undertaken as part of the creation of the place strategy, and the results and recommendations of these informed the proposed separation between the town centre and employment areas. Further detailed controls will be investigated and established as part of the next stage of the process, and these will work together with existing regulations to manage the risk of noise and dust impacts.
20	Information	It appears as if there is nothing to do here like the rest of Sydney's new developments. Sterile and boring.	0	0	The town centre sub precinct will include retail, commercial, community and recreational facilities, and an 18-hour-a-day entertainment precinct, that will deliver a lively atmosphere and provide residents and visitors with a range of indoor and outdoor opportunities for recreation and enjoyment. Opportunities will be provided for new population serving businesses in the urban services sub precinct such as breweries, technical services and creative industries while maintaining heavy industrial land for important

ID	Pin Type	Summarised Comment	Up Votes	Down Votes	Department Response
					employment uses and innovative industries and businesses built around circular economy and recycling.

Community Submissions

Table 7: Responses to Community Submissions

Submitter	Theme	Summarised Submission Comment	Department Response
Aileen Ng	Place Strategy – General, Development – Overall Density/Scale of Development, Infrastructure – General	Objects to the Place Strategy due to the number of new dwellings and inadequate infrastructure.	The place strategy has been informed by a range of technical studies, including urban design and traffic/transport investigations. These have carefully examined the opportunities and constraints of the precinct to deliver a vision which proposes an appropriate density of housing, supported by key transport and social infrastructure (including schools, community facilities, and open spaces). Refer Section 4.3 and 4.7.2 of this report for further detail.
Amit Dhani	Place Strategy – General, Traffic and Transport – Metro	Supports the strategy. Suggests a metro stop at Camelia, with particular support for east-bound movement given the significant increase in population.	Support for the strategy is noted. The NSW Government investigated the potential for a station at Camellia as part of the strategic planning for Sydney Metro West. The government decided that a station will not be progressed at Camellia due to identified environmental constraints. However, Stage 1 of the Parramatta Light Rail runs through the precinct, and Stage 2 is now also proposed to run through the precinct. These will significantly improve transport access to and from the precinct east bound with frequent and reliable services to Parramatta CBD and Sydney Olympic Park. Refer Section 4.1.2 and 4.1.6 of this report for further detail.
Barbara Bryan	Place Strategy – General, Development – Overall Density/Scale of Development, Development – Yield, Infrastructure – General	Objects to the plan. Considers the density and scale of the project will not create a liveable residential precinct.	The place strategy has aims to ensure that the precinct will be of high amenity, supported by adequate open space, public transport and cycling connections, and social infrastructure including schools and community facilities. Refer Section.7.2 of this report for further detail on density and scale of development. Detailed planning controls will be developed as part of the rezoning process

Submitter	Theme	Summarised Submission Comment	Department Response
			to ensure that high quality outcomes are delivered.
Barbara Bryan	Place Strategy Process – Technical Studies	Notes studies are out of date (7 years old) and therefore not appropriate. Raises concerns that since then there has been substantial nearby development which has not had due consideration, including the impact of this development on issues such as traffic and flooding.	The place strategy was informed by 17 specialist studies which were all undertaken in 2021–2022 and exhibited with the draft place strategy. Refer Section 2.3 of this report. These specialist studies all utilised the latest information available.
Barbara Bryan	Traffic and Transport – Roads/Vehicular Infrastructure	Concerned about capacity constraints of Victoria Road to cope with additional traffic from the proposed northern bridge linkage and considers there has been no government or council consideration of the need to upgrade Victoria Road.	A traffic and transport implementation report was undertaken to support the place strategy, which analysed the proposed transport connections and impacts on the surrounding traffic network at a strategic level. More detailed traffic analysis will be undertaken as part of the Integrated Transport Study (Action 3.1) that will provide specific recommendations on what upgrades or modifications are needed to ensure that the surrounding transport network has the capacity to manage the increased traffic. Refer Section 4.1.5 for further detail.
Barbara Bryan	Traffic and Transport – Public Transport	Increase the frequency of Rivercat ferry services from Parramatta via Rydalmere wharf, which is currently inadequately serviced.	TfNSW is responsible for scheduling of ferry services including F3 Parramatta River services from Rydalmere. Buses replace some ferry services between Parramatta and Rydalmere due to the natural low tides in the upper Parramatta River. This feedback has been forwarded on to TfNSW for their consideration.
Barbara Bryan	Environment – Remediation	Concerned contamination issues have not been adequately dealt with and expects state government to take responsibility for remediation	The place strategy includes an integrated remediation strategy, which will establish a precinct-wide approach to contamination issues and ensure appropriate remediation and contamination management before

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>before any sites are sold to developers.</p>	<p>development occurs. This strategy will be implemented by government (including the department, the NSW Environment Protection Authority, and City of Parramatta Council) in partnership with landowners through the rezoning process. Refer Action 5.1 of the place strategy.</p> <p>Management of contaminated land is governed by <i>Contaminated Land Management Act 1997</i> and the <i>Environmental Planning and Assessment Act 1979</i>. Remediation of sites is the responsibility of the landowner with oversight by state or local government depending on the level of contamination. The strategy recognises however that management of contamination for the precinct would benefit from oversight by one government body/organisation. Work on the implementation of the remediation strategy including investigating governance arrangements is ongoing. Refer Action 5.2 of the place strategy.</p> <p>Refer Section 4.2.1 of this report for further detail on the precinct approach to remediation.</p>
<p>Barbara Bryan</p>	<p>Amenity – Noise</p>	<p>Concerned about noise impacts due to inadequate separation from nearby industries, roads, railways etc.</p>	<p>A noise and vibration implementation report was prepared to support the place strategy. This report concluded that noise impacts are manageable through the implementation of various measures through the development process, including setbacks, noise reduction, and acoustic treatments of new buildings. Mitigation measures will be further investigated and implemented as part of developing controls to support the future rezoning as well as the development application process. Refer Section 4.8 of this report for further detail.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
Barbara Bryan	Social Infrastructure – Open Space	Requests more open space in between apartment blocks.	<p>The precise designs of development lots and any apartment buildings will be determined at the development application stage.</p> <p>Future apartment developments will need to comply with the relevant requirements including the Apartment Design Guideline which outlines separation controls.</p>
Ian Kentwell	Traffic and Transport – General	Concerned about the removal of the Clyde rail line and the lack of transport accessibility to and from Rosehill, as well as connections in the surrounding areas including Dundas, Clyde, etc.	<p>A range of new and upgraded transport infrastructure will improve access to and from the precinct and surrounding areas. This includes Parramatta Light Rail Stage 1, Sydney Metro West, and the Wilderline (conversion of the old Clyde rail line) walking and cycling connection running north south currently being delivered by TfNSW as well as new road, walking, and cycling connections proposed under the place strategy.</p> <p>Refer Section 4.0 for further detail.</p>
James Colman on behalf of Laurie Bennett	Place Strategy Process – Engagement	Considers certain matters raised in their submission to the Directions Paper have not been adequately addressed in the What We Heard Report. Notes they are generally supportive of the findings of the Consultation Report of December 2021 however request further attention/consideration of some matters (see below).	<p>The What We Heard Report was a summary of responses to issues raised in the Directions Paper.</p> <p>Specific matters are addressed below.</p>
James Colman on behalf of Laurie Bennett	Place Strategy Process – Implementation	Argues that for an “integrated and holistic” approach to the management and implementation of the project is to be achieved, a dedicated redevelopment authority bringing “whole of government” resources will be necessary. Notes on page 12 of the Consultation Report the recommendation is not discussed	<p>The strategy identifies the need to investigate models where one government agency/organisation is responsible for managing contamination (Action 5.2).</p> <p>There is very limited government owned land within the precinct and as such the establishment of a bespoke redevelopment authority is not considered appropriate. The place strategy will be implemented through a project control</p>

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>and no reasons are offered for its apparent rejection. The Report merely states that the “the project team will continue to work with stakeholders to determine appropriate governance structures and mechanisms to put the place strategy into action”.</p> <p>Notes if the Camellia–Rosehill project is to become a ‘world class’ example of its kind, it will require an imaginative and innovative management model to be adopted before crucial decisions on infrastructure and environmental clean-up (for example) are made.</p>	<p>group which will involve all relevant state and local government agencies, including City of Parramatta Council, Transport for NSW and School Infrastructure NSW. The project control group will ensure coordination between agencies. Refer Section 9 of the place strategy for further detail.</p>
<p>James Colman on behalf of Laurie Bennett</p>	<p>Place Strategy Process – Technical Studies</p>	<p>Notes there is no reference to the east–west CBD growth option in the Consultation Report. It is submitted that the department’s failure to discuss or even acknowledge the option is unacceptable for a public agency devoted to the cause of planning. Recommends if there are good and sound reasons for rejecting the east–west option they should be placed on the public record. As this has not yet been done, the department’s response is formally requested.</p>	<p>The department has recently finalised the Parramatta CBD Planning Proposal, which is the relevant planning process that this matter relates to.</p>
<p>James Colman on behalf of Laurie Bennett</p>	<p>Connecting with Country</p>	<p>Notes the report does not refer directly to the comment in the earlier submission that Indigenous participation must go beyond tokenistic expressions of ‘welcome to Country’ and ‘healing and restoring’. An example was offered: gifting or otherwise making available to our First Peoples a selected site</p>	<p>The engagement process implemented to date has been substantial and follows all best practice considerations, including the recent Government Architect Guidelines. This engagement has established and shaped the principles and actions for the next stages of the process, as included in the place strategy.</p> <p>The place strategy includes an action (Action 1.1) that commits government and</p>

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>within Camellia–Rosehill, with the future of that site being determined by their representatives in the true spirit of healing and restoring.</p>	<p>industry to ensuring Connecting with Country activities are meaningfully continued beyond the place strategy through a Community Reference Group.</p> <p>Refer to Section 4.10 of this report and the connecting with country and aboriginal cultural heritage assessment reports for further detail.</p>
<p>James Colman on behalf of Laurie Bennett</p>	<p>Environment – Ecology</p>	<p>The creation of a riverside buffer is strongly supported in submissions. The department is urged to increase the minimum width from 40m to at least 60m, to enable flexibility having regard to the precise location of mangrove stands, drainage lines, soil quality and the like.</p>	<p>A minimum 40m foreshore area is provided for Vegetated Riparian Zones of 40m for Parramatta River, 30m for Duck River, 20m for Duck Creek and 10m for A’Becketts Creek (distances are on both sides of the waterway, measured from the highest bank point).</p> <p>However, these are minimums, and may vary across the precinct, including being deeper in some areas where there are district parks or to protect certain habitats and species present, in compliance with the relevant legislation, including the <i>Fisheries Management Act 1994</i>, <i>Biodiversity Conservation Act 2016</i>, and the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth).</p> <p>Refer to ecological implementation report for further detail.</p>
<p>James Colman on behalf of Laurie Bennett</p>	<p>Housing – Affordable Housing</p>	<p>Notes there was no discussion of social housing in the Directions Paper. Without any supporting data the Consultation Report identifies a minimum 5% affordable housing. It is submitted that 5% as a minimum target for affordable housing is irresponsible and grossly inadequate. At a time when housing affordability is becoming a daily headline issue nationally, Camellia–Rosehill offers a rare opportunity for official</p>	<p>Due to the high costs of remediation and infrastructure a range of 5–10% (subject to viability) is considered appropriate and is in line with state government policy <i>Greater Region Plan – A Metropolis of Three Cities</i> and the <i>GPOP Vision</i>.</p> <p>The place strategy has been updated to clearly identify that 5 to 10% affordable housing will be investigated. We will undertake further assessment of feasibility as part of the future rezoning and developing the infrastructure framework.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
		generosity on this important aspect of social policy. A minimum in the range of 10–15 % is suggested.	Refer Section 4.12 of this report for further detail.
Kaye Fraser	Place Strategy – General, Social Infrastructure – Community Facilities, Social Infrastructure – Public Spaces	Objects to the place strategy due to concerns about inadequate social infrastructure (public space and facilities) to support the population.	<p>The place strategy and supporting technical studies clearly set out the necessary infrastructure (particularly sufficient social infrastructure) required to support 10,000 dwellings. The place strategy proposes:</p> <ul style="list-style-type: none"> • 54.5 hectares of open space an increase of 10.8ha from the draft place strategy • a minimum of 4,300m² for multipurpose community hub • 5–10% for affordable housing • investigation sites for a primary school and K–12 school. <p>Refer Section 4.3 and social infrastructure implementation report for further detail.</p>
Kenneth Graham	Place Strategy – General, Social Infrastructure – Open Space, Traffic and Transport – Active Transport	Supports the long term strategy, in particular the commitment to open spaces and active transport.	Noted.
Kyunge Choo	Economy – Employment, Environment – General, Heritage, Infrastructure – Utilities, Traffic and Transport – General	Supports the creation of 14,500 jobs and the Place Strategy's proposed measures for heritage protection, environmental management, transport and utilities	Noted.

Submitter	Theme	Summarised Submission Comment	Department Response
Lenny Pelling	Place Strategy – General, Environment – Sustainability, Urban Design – General	<p>Generally, supports the place strategy and regards this as an important critical step in the revival and opening up of the foreshore.</p> <p>Recommends more innovative ways to reduce the visual/environmental impacts of industrial buildings through measures such as green rooftops, street plantings, etc.</p>	<p>Support for foreshore revitalisation is noted.</p> <p>The draft and final place strategy and supporting landscape implementation report includes green canopy cover targets for development types that will be implemented through future planning controls. Opportunities for green roofs, street plantings and other innovations will be investigated as part of future development processes.</p>

Landowner Submissions

Table 8: Responses to Landowner Submission

Submitter	Theme	Summarised Submission Comment	Department Response
Australian Turf Club	Place Strategy Process – Engagement	Australian Turf Club (ATC) requests the continuing direct dialogue with the department team and their appointed key planning and design consultants, as 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.	The department is committed to continued engagement with all stakeholders throughout all stages of the process.
Australian Turf Club	Planning Controls – Land Use	<p>While the ATC 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.</p> <p>Previous high-level master planning for the site has shown that this part of Rosehill Racecourse site is highly suitable for higher density redevelopment it 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 also immediately adjacent to the Parramatta Light Rail and future Metro alignment enabling future workers and residents to rely on high frequency public transport which will in turn reduce car dependency.</p>	The Town Centre (Medium) designation is based on being located in the hazard consequence zone (130m of the fuel pipeline) in accordance with the Qualitative Risk Assessment. This land referred to is now designated for local open space.
Australian Turf Club	Planning Controls – Land Use	Requests the proposed ‘Entertainment’ Precinct portion of the Rosehill Gardens Racetrack	The final place strategy has amended the Entertainment precinct to also allow residential uses in this space.

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>should be rezoned to a mixed use zone, including residential as it will enable a greater mix of land uses to be facilitated, such as the 18 hour precinct as envisaged by the draft Strategy.</p> <p>Further, ATC are supportive of the incorporation of flexibility into the proposed planning controls, however questions how this will be implemented in practice. Notes the need to ensure that a wide range of permissible land uses are provided for within the precinct and on ATC land. 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.</p> <p>Requests zoning for the whole of ATC land should remain mixed to enable a flexible mix of commercial, retail, and residential uses to be developed to 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.</p> <p>Additionally, the ATC notes that 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. Supports DPE if they move to introduce the new zoning of SP3, as long as 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.</p>	<p>The place strategy proposes a MU Mixed Use zone or SP3 Tourist zone for the entertainment precinct, with the racetrack as either RE2 Private Recreation or SP3 Tourist zone, which reflects the development outcomes envisaged. This will be further investigated and confirmed through the rezoning process.</p> <p>This amendment has not changed the total number of dwellings proposed for the precinct, rather it has shifted dwelling capacity from the north-western corner of ATC's land, which is now proposed to be open space.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
Australian Turf Club	Infrastructure – Funding and Delivery	<p>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.</p> <p>Further, 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 is raised at the statement in the plan, which states:</p> <p><i>“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.”</i></p>	<p>The key sites mechanism is one potential approach which could be used to deliver social, recreation and open space infrastructure through works in-kind, or via land dedication, in exchange for the uplift provided by the rezoning and greater density proposed in the place strategy. The key sites provision would not enable further uplift.</p> <p>The application of the key sites’ mechanism will be determined based on further detailed assessment in the next stage of planning, that verifies that the key site can be feasibly developed while absorbing the extra infrastructure costs.</p>
Australian Turf Club	Development – Feasibility, Development – Overall Density/Scale of Development, Development –	<p>Notes any reliance on the ATC 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</p>	<p>Further infrastructure and feasibility studies will confirm and lock in the location of and funding sources for social infrastructure and open space.</p> <p>Open space across the precinct has been reviewed in consultation with ATC and adjusted to ensure it does</p>

Submitter	Theme	Summarised Submission Comment	Department Response
	Yield, Infrastructure – Funding and Delivery	contributions. Any such infrastructure could not impact on any essential course proper or track operational requirements.	not impact on the course proper or track operational requirements.
Australian Turf Club	Development – Yield, Infrastructure – Funding and Delivery, Social Infrastructure – Schools	<p>Comments that Rosehill Gardens Racetrack site is identified as being suitable to provide open space (including public recreation), and a combined primary/high school. ATC are concerned that this places a large burden on them and their land and notes 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. Additionally, notes that this burden has yet to be discussed with the ATC in detail. The ATC request that dialogue regarding feasibility assessments undertaken to offset potential social infrastructure commences to ensure an equitable outcome is reached.</p> <p>Additionally, while the ATC acknowledges that the draft Strategy is conceptual only, consideration of the functionality of ATC land needs to be considered. Placing a K-12 school for example immediately adjacent to the racecourse proper will result in numerous issues.</p>	<p>As above open space has been adjusted to ensure it does not impact on the course proper or track operational requirements.</p> <p>We have done further analysis to confirm that proposed land-use controls are feasible. We will consult with landowners and further assess feasibility as part of future rezoning and developing the infrastructure framework.</p> <p>The preferred location of the K-12 school is now identified as the existing horse stables in the south-west corner of the racecourse. This site is contiguous with the mixed use development areas to the west of Rosehill Racecourse and well linked to open space, the Wilderline, and active transport networks providing connection to the Town Centre. Further due diligence and design investigations will be undertaken to confirm that the school site is suitable. Refer Section 4.3.1 of this report.</p> <p>Planning controls will be investigated to ensure that any land use conflict or other matters are adequately addressed. Refer Section 4.8 of this report for further detail.</p>
Australian Turf Club	Development – Staging	Notes that should ATC land be burdened with the expectation of enabling significant social infrastructure, then consideration should also be given to the fact that ATC land is the least burdened, and located appropriately in relation to high frequency public transport	<p>The staging plan in the final place strategy has been updated to include the following:</p> <ul style="list-style-type: none"> In the 0-5-year timeframe for the employment areas, we have identified the need to <i>‘Progress development of the entertainment precinct, capitalising on existing</i>

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>(current and proposed). Logical development of the precinct should commence with land with the least economic constraints placed on redevelopment, such as access, land contamination and flooding.</p> <p>The ATC 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 ATC land earlier in the process.</p> <p>The ATC 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). Notes aspirational staging should be cognisant of logical redevelopment opportunities.</p>	<p><i>entertainment facilities and connections to the Parramatta CBD'</i></p> <ul style="list-style-type: none"> • For the town centre, residential and entertainment area <ul style="list-style-type: none"> ○ In the 0–5–year timeframe that there will be works for open space and community infrastructure to support early–stage development ○ In the 5–10 timeframe that there may be development not only on remediated sites but sites with few constraints once the base infrastructure for the precinct is established. <p>These additional points recognise the ability of some sites to progress earlier, while also recognising that base infrastructure will need to be in place to support this (social and transport) and the contribution that the entertainment precinct can make towards a thriving town centre.</p>
<p>Australian Turf Club</p>	<p>Environment – Remediation, Traffic and Transport – Parking</p>	<p>ATC generally support strategies to minimise the environmental impact of developments, however 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 sites that are not inhibited by contamination issues.</p> <p>In regard to the prevention of basement parking, the ATC request that flexibility be applied to enable</p>	<p>Given the constraints present across much of the precinct, the department considers it appropriate to maintain the position that basement parking would not be supported in most sites in the precinct. However, we acknowledge that there may be select situations, where supported by evidence, that basement parking is reasonable.</p> <p>Accordingly, the following wording has been updated in the place strategy:</p>

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>site by site assessment of the suitability of basement parking.</p>	<ul style="list-style-type: none"> Decoupled Parking and Car Share section of Strategic Direction 3: wording changed from <i>"Due to contamination issues within the precinct, basement parking is unlikely to be provided except in specific and limited circumstances."</i> to <i>"Basement parking is unlikely to be permitted except in specific and limited circumstances on sites that are not affected by certain constraints, including contamination and flooding."</i> Precinct-Wide Remediation Strategy section of Strategic Direction 5: wording amended from <i>"restrictions on basement parking, except in limited circumstances"</i> to add <i>"on sites not affected by contamination."</i> Strategic Direction 5 sub-section of the Planning and Design Controls section: wording amended from <i>"Restrict basement parking except in limited circumstances"</i> to add <i>"on sites not affected by contamination or flooding constraints"</i>
<p>Australian Turf Club</p>	<p>Place Strategy Process – Engagement</p>	<p>Concerned the proposed future place strategy will not deliver optimal place making outcomes if the current heavy rail easement is not removed/ relocated. ATC question if Sydney Metro and the DPE will have a coordinated approach to the issue of the heavy rail corridor, particularly given its impact on the potential redevelopment of the site. Notes urgent coordination is required with TfNSW, Sydney Metro to achieve positive urban design outcome for ATC. Recommends that DPE facilitate this opportunity, so that the revised corridor through the ATC land</p>	<p>The department has been liaising extensively with Transport for NSW and Sydney Metro throughout the development of the place strategy on a number of matters including the section of the former Carlingford line that will no longer be needed following the construction of Parramatta Light Rail and Sydney Metro West. This will continue as part of the rezoning process to ensure that an optimal urban design outcome is achieved. This feedback has also been provided directly to Sydney Metro and it is understood they are also liaising with you</p>

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>can be jointly designed with input from TfNSW as part of future site wide master planning.</p> <p>Specific attention is drawn to the cadastre overlay prepared by ATC and included in the ATC submission. Note the overlay clearly depicts a disconnect between the proposed built form relevant to ATC 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.</p>	<p>regarding this issue and other matters.</p>
Australian Turf Club	Development – Feasibility, Hazard Risks	<p>The ATC request reconsideration of the zoning of land which falls within the ‘pipeline consequence affected zone’. Notes the proposed zoning appears to locate only Town Centre (medium) within the affected zone, to offset potential social infrastructure obligations of ATC land, these zones need to provide for Town Centre (High), allowing higher density development closer to key public transport nodes.</p>	<p>The Town Centre (Medium) designation is based on being located in the hazard consequence zone (130m of the fuel pipeline) in accordance with the Qualitative Risk Assessment. This land referred to is now designated for local open space.</p>
DBL Property Pty Limited on behalf of Viva Energy Property Group	Planning Controls – Development Controls	<p>Notes a strong demand for the industrial land for a range for users and uses which require increased height. There have been enquiries for high Bay warehousing; multi-level warehousing and larger industrial users such as the Downer Facility that is already constructed on the site (41 metres).</p> <p>Recommends that the height of 25 metres be considered, which would allow high bay warehousing, two level industrial development, and the majority of higher industrial facilities for the Camellia area and specifically</p>	<p>We have removed the height control for these sites, with density to be controlled through a FSR of 1.5:1. Refer Section 4.4 of this report for further detail.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
		their site at the Central Sydney Industrial Estate.	
Guy Smith (Goodman)	Place Strategy – General, Planning Controls – Land Use	Generally supportive of the strategy, particularly the proposed E3 productivity zone on the Goodman site. Considers this will provide appropriate land use flexibility to ensure this land acts as a useful buffer between heavy industrial and town centre.	Noted. Zoning will be confirmed through the rezoning process.
Guy Smith (Goodman)	Traffic and Transport – Roads/Vehicular Infrastructure	Maintaining the existing road connection to Parramatta Road via Wentworth, Kay and Unwin Streets is essential to the vision and potential of the Precinct being realised. Concerned this may be lost as the Strategy maps are not clear on the future of this road which provides a crucial alternative to the James Ruse Drive / Grand Avenue intersection, which is heavily congested throughout the day.	The existing road connection to Parramatta Road via Wentworth, Kay and Unwin Streets is planned to be retained as part of the place strategy, though its route will be amended as part of the works by Sydney Metro to create the Clyde Maintenance and Stabling Facility. To provide additional clarity in the place strategy, the statement “Access to Parramatta Road via Wentworth Street will be retained.” has been added in Strategic Direction 3.
Guy Smith (Goodman)	Infrastructure – Funding and Delivery, Traffic and Transport – Roads/Vehicular Infrastructure	Supports the proposed road connections and acknowledges that this is critical for business operations and success. Concerned about the uncertainty of these connections being delivered and recommends that future proposed development, particularly the town centre and entertainment precincts, not progress until the access requirements for the existing users in the precinct are ensured through adequate road infrastructure.	Support for the road connections is noted. The place strategy acknowledges that delivery of key transport infrastructure upgrades and new connections will be required prior to development of the town centre, to ensure the precinct can continue to operate efficiently. The integrated transport study to support future rezoning will confirm new and improved transport infrastructure required to support the renewal, as well as the associated costs. This work will inform the infrastructure framework and strategic business case/s to confirm costs, lock in timing and funding sources. Refer Section 4.1.1, 4.1.5 and 4.5.1 of this report for further detail.

Submitter	Theme	Summarised Submission Comment	Department Response
Guy Smith (Goodman)	Planning Controls – Development Controls	Requests that current height and FSR (20m and 1:1) controls for urban services should be reviewed to accommodate future multistorey warehouse developments which is now being provided in Australia in key strategic locations. This is largely due to land shortages and greenfield development constraints, with two recent examples identified delivered by Goodmans in Alexandria. Recommends a height control of 30m and FSR of 1.5:1 to encourage future redevelopment.	We have removed the height control for these sites, with density to be controlled through a FSR of 1.5:1. Refer Section 4.4 of this report for further detail.
Macken Planning Solutions	Planning Controls – Land Use	Supportive of alternative land uses, zones and planning controls being considered for the eastern portion of the precinct between Grand Avenue and the Parramatta River. However, considers that a Mixed Use zoning as opposed to E3 Productivity is more suitable as it will allow a greater range of activities, including residential, providing the necessary uplift to support the precincts redevelopment, remediate the contamination and provide for the restoration of the riparian corridor. Notes that the E3 zone allows for uses compatible with residential development such as tourist accommodation, hotel and motels and suggests a cap to limit the amount of residential, or a typology such as build to rent.	We consider the proposed urban services uses and E3 Productivity Support zoning to be the most appropriate for this area of the precinct as it is: <ul style="list-style-type: none"> • Constrained by hazard risks and potential air, odour and noise impacts from surrounding industry • It will allow heavy uses to transition over time while still supporting employment outcomes and buffer to the town centre.
Macken Planning Solutions	Planning Controls – Land Use	Suggests the option of applying a SP4 Local Enterprise Zone across this precinct could provide the flexibility needed to support growth and change. It 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	Application of a blanket zone across the entire precinct is not being progressed as an option for the rezoning as it has the potential to dilute the employment outcomes, being the promotion and protection of employment and urban services uses that are critical to the Central

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>for any land use conflicts to be resolved at the DA stage and not through the prescriptive, slow and cumbersome strategic planning process.</p>	<p>City and the Greater Sydney region generally.</p> <p>Additionally, application of the SP4 Local Enterprise Zone to land currently proposed to be zoned for employment, recreation and special uses (such as schools) could also potentially have the effect of increasing land values, which would impact the feasibility for these core uses to be realised.</p> <p>Notwithstanding zoning will be further investigated and confirmed as part of future rezoning process.</p>
Macken Planning Solutions	Planning Controls – Development Controls	<p>Considers the proposed development standards for urban services (height 20m and FSR 1:1) are too low to support the precinct’s redevelopment. Notes that the Economic analysis compares the future urban services of the areas to Alexandria which has a maximum height ranging from 35 metres to 60 metres, FSR ranging from 2.5:1 to 3.5:1, and extremely broad range of permissible activities with only a few prohibitions.</p>	<p>We have removed the height control for these sites, with density to be controlled through a FSR of 1.5:1. Refer Section 4.4 of this report for further detail.</p>
Macken Planning Solutions	Planning Controls – Development Controls	<p>Notes in recent years that the protections for existing use rights in NSW have 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. Notes that the place strategy states that the department will investigate "special provisions" to bolster the protection of uses for companies like Boral, Veolia and Concrete Recyclers, recommends this protection should also be extended to protect landowners.</p>	<p>The department notes these concerns. Potential mechanisms such as introducing a ‘sunset clause’ which maintains the permissibility of the uses or sites for a set period of time, after which they can be reviewed in the context of the Precinct’s maturation will be investigated as part of the rezoning process.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
Macken Planning Solutions	Place Strategy Process – Implementation	Considers that there is a greater need for flexibility and review in the strategy given it's a 20-year plan. Notes that if it is to be successful, it should be adaptable and subject to active revision and amendment as circumstances change, and new opportunities emerge.	The 20-year timeframe for this strategic place strategy is considered an appropriate length of time. Revisions can be made to the place strategy to respond to changing circumstances (if required).
Patch Planning on behalf of Equinix Australia	Traffic and Transport – Roads/Vehicular Infrastructure	Request that the transport corridors throughout the strategy be revised so that they no longer encroach on the subject site along the eastern, western, and southern boundaries. Roads at 8–10 Grand Avenue Rosehill, conflict with development approved under DA/751/2019, which is under construction at the site.	The internal local road network is indicative as noted on the master plan and is intended to show strategic intent for future connections. These roads will be investigated in detail as part of the rezoning process, and this investigation will factor in matters including developments approved and under construction.
Patch Planning on behalf of Equinix Australia	Planning Controls – Development Controls	Requests that the final Place Strategy provide flexibility in relation to height in the urban services sub-precinct to allow for buildings to exceed the nominated height limit in certain circumstances where strategic and site-specific merit can be demonstrated.	We have removed the height control for these sites, with density to be controlled through a FSR of 1.5:1. Refer Section 4.4 of this report for further detail.
SJB planning on behalf of The GPT Group	Infrastructure – General	Notes the draft Strategy proposes an inequitable distribution of public infrastructure across the precinct. Around 75% of GPT's eight (8) hectare site has been designated for public infrastructure including a school, parkland and transport links. Aside from the foreshore parkland, the majority of open space proposed within the town centre is located within the eastern part of the centre, on GPT's site, despite the areas of greatest residential density being located within the western portion of the centre.	A detailed review of open space has been undertaken in consultation with the project team and other stakeholders, including council. This had led to changes to the proposed locations of open space, including for this site. Refer Section 4.3.2 of this report.

Submitter	Theme	Summarised Submission Comment	Department Response
SJB planning on behalf of The GPT Group	Planning Controls – Land Use, Social Infrastructure – Schools	<p>Questions the suitability of this location for a primary school given the significant length of interface with the PLR and the potential conflicts during busy school drop-off and pick-ups times in the morning and afternoon. Comments that a school in this location will not capitalise on the place making opportunities presented by the PLR. The School site has a frontage of around 220m to the light rail and it is anticipated that a substantial portion of this frontage will be occupied by high security fencing, exacerbating the potential lack of activation along the light rail. A school location on the outskirts of the town centre with strong connections to the adjoining school populations would be more appropriate to avoid conflicts with adjoining land uses and public infrastructure.</p>	<p>At this stage of the process, the nominated site is considered most appropriate for the location of a primary school in the precinct. A detailed review will be undertaken by School Infrastructure as part of the rezoning process to confirm the site's suitability, and the land area needed.</p>
SJB planning on behalf of The GPT Group	Planning Controls – Land Use, Social Infrastructure – Schools	<p>GPT has advocated for a compact school design within the town centre that incorporates shared facilities/open space for use by the wider community. Given the site constraints and the density and built form of development that is being contemplated, a public school located within the town centre should adopt a compact model, and be accommodated on a maximum 1.5 hectare site, that is co-located with shared open space that is accessible to the wider community outside of school hours.</p>	<p>A 2-hectare site is identified, consistent with School Infrastructure NSW advice. A detailed review will be undertaken by School Infrastructure as part of the rezoning process to confirm the site's suitability, and the land area needed.</p>
SJB planning on behalf of The GPT Group	Planning Controls – Land Use, Social Infrastructure – Schools, Traffic and Transport –	<p>Notes the proposed north-south link which extends over the Parramatta River and connects to Clyde Street increases the burden of public infrastructure on GPT's land. A green, active link in this location has merit in</p>	<p>A north-south road connection further east presents a number of challenges and does not provide the optimal outcome. Refer Section 4.1.1 of this report for further detail.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
	Roads/Vehicular Infrastructure, Traffic and Transport – Active Transport	providing a continuous green corridor from the northern side of the river to the potential district/regional open space facilities within the southern part of the precinct. On this basis, the link would ideally be limited to a shared/active transport green link for pedestrians and cyclists. A new bridge crossing for buses and general traffic that connects to Victoria Road, would be better located further east, and integrated with the PLR Stage 2 crossing. The previous 2018 draft master plan identified a crossing at Thackery Street, this would achieve the same outcome of a northern connection to Rydalmere at Victoria Road.	
SJB planning on behalf of The GPT Group	Traffic and Transport – Parking – Decoupled Parking	Considers there is a lack of information on the practical operation and implementation of decoupled parking within comparable locations to the Camellia–Precinct. Notes GPT does not currently support decoupled parking on site and considers car parking integrated with apartment buildings within sleeved podiums, remains the most viable option for accommodating parking within the precinct.	The provision of decoupled parking in separate structures has been removed from the master plan and place strategy to provide more flexibility in the way it can be integrated with the future design of buildings. Refer Section 4.1.7 of this report for further detail.
SJB planning on behalf of The GPT Group	Planning Controls – Land Use, Traffic and transport – PLR	Concerned that major land use and infrastructure decisions are being made in the absence of details of the configuration PLR Stage 1 and the confirmed alignment of Stage 2 PLR.	The department has been liaising extensively with the Parramatta Light Rail team in Transport for NSW to ensure coordination between the place strategy and both stages of the Parramatta Light Rail. Refer Section 4.1.2 of this report for further detail.

Government Agencies and Utility Providers Submissions

Table 9: Responses to Government Agencies and Utility Provider Submissions

Submitter	Theme	Summarised Submission Comment	Department Response
NSW Department of Planning and Environment – Environment, Energy and Science Division (DPE Environment, Energy and Science)	Environment – Ecology	Notes that the Ecological Implementation Report, dated December 2021, section 2.4.3, recommends using locally indigenous species in the remediation and greening strategies. The Environment, Energy and Science Division (EES) supports this but recommends that the aim of these strategies should be to recreate the plant community that likely occurred in the location prior to development and that local provenance seeds should be used.	The final place strategy, ecological implementation report, and landscape implementation report have been updated to identify that locally indigenous species should be utilised, with the aim to recreate the plant communities present before colonisation and development.
DPE Environment, Energy and Science	Environment – Ecology	To assist in mitigating the urban heat island effect and to improve the urban tree canopy and local habitat, it is recommended that the landscape plan under the strategy aims to: <ul style="list-style-type: none"> • Avoid removing existing trees where possible, particularly any local native species. • Replace any removed trees at a ratio greater than 1:1 for trees not covered by a biodiversity offset. • Replace trees with local provenance native plant species from the local native vegetation communities that occur or occurred in the local area to enhance local biodiversity, rather than 	The final landscape implementation report has been updated to incorporate these objectives.

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>plant non-local native or non-native plants.</p> <ul style="list-style-type: none"> • Use advanced and established local native species, to assist in mitigating the removal of trees, as the loss of existing trees and the benefits that they provide takes years for a juvenile tree to grow and replace. • Provide sufficient area/space to allow the trees to grow to maturity. 	
<p>DPE Environment, Energy and Science</p>	<p>Environment – Ecology</p>	<p>EES considers that the discussion and analysis of the potential impacts to threatened species, including efforts to minimise, manage and restore areas of habitat, should be refined to include the following aspects:</p> <ul style="list-style-type: none"> • The ecology report identifies in Figure 4 an area of wetland in the east of the site. It is unclear why this area is not included as potentially impacted by redevelopment associated with the draft strategy. • Areas of exotic grassland may provide shelter and forage opportunities for the threatened Green and Golden Bell Frog (GGBF). Efforts should be made to retain any such areas, particularly around the wetland and riparian corridors. • The ecology report identifies that vehicle movements may impact 	<p>Each dot point is responded to directly in the dot points below:</p> <ul style="list-style-type: none"> • Figure 4 (now Figure 7 in the final ecological implementation report) has been updated to show all protected vegetation with potential to be impacted by future works using the precautionary principle, under the master plan. This includes vegetation communities in the wetland. The report also provides suggested measures to mitigate any potential indirect impacts. • Noted. Statements recognising this have been added to a new Section 2.5.2 in the final ecological implementation report. • Noted. Statements recommending that frog fencing be explored have been added to a new Section 2.5.2 in the final ecological implementation report. • Section 2.6.1.2 (now Section 2.6.2 in the final ecological implementation report) has been updated to include this statement. • Section 2.6.1.3 (now Section 2.6.3 in the final ecological

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>threatened species, including GGBF. One potential mitigation measure to reduce this impact is to provide frog fences around habitat to reduce vehicle strike of GGBF.</p> <ul style="list-style-type: none"> • The ecology report states in section 2.6.1.2 that any works in mapped areas of 'Biodiversity Value' will require the preparation of a Biodiversity Development Assessment Report (BDAR). This section should include a note that the Biodiversity Values Map as shown in Figure 5 may change and should be reviewed prior to any works. • The ecology report states in section 2.6.1.3 that if an activity is likely to have a significant impact or will be carried out in a declared area of biodiversity value (AOBV), then the Biodiversity Offset Scheme (BOS) must be applied. This is incorrect. If the activity is likely to have a significant impact, or will be carried out in a declared AOBV, then a species impact statement must be prepared, or a BDAR can be prepared if the proponent has opted into the BOS. 	<p>implementation report) has been corrected in line with this information provided.</p>
DPE Environment,	Environment – Ecology	EES recommends that the presence of the threatened	This species has been historically recorded within the Wetland area that is

Submitter	Theme	Summarised Submission Comment	Department Response
Energy and Science		Downy Wattle (<i>Acacia pubescens</i>) species identified in the ecology report is confirmed prior to finalisation of the place strategy. If this species is still present, it could be of significance as it is at the edge of the species' geographic range. It is noted that Section 2.5.1 of the ecology report states that if the species is found during surveys for future works, then a management plan should be put in place to protect it.	proposed to be retained by the place strategy. Targeted surveys can be conducted at the development stage to ensure no impacts occur. Additionally, Section 2.5.1 of the ecological implementation report states that <i>“Any proposed future works, particularly those relating to future active transport along the foreshore, in the vicinity of historically recorded threatened species should conduct the appropriate targeted surveys in line with state and federal government guidelines and survey periods.”</i>
DPE Environment, Energy and Science	Environment – Ecology	Clarification is required regarding Figure 5.2 in the water management report as the text states this is the 1% AEP flood afflux map, however the image includes sea level rise. Notes it may be useful to include figures both with and without sea level rise in the main body of the report, but the figure without should preferably be included as a minimum. It is noted these figures are also found at the water management report Appendix C.	The final integrated water management strategy implementation report now includes separate figures that show the 1% AEP afflux and the 1% AEP with climate change and 2m sea level rise afflux, being Figures 5.2 and 5.3, respectively.
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	With reference to Figure 17 in Appendix C, it appears that the north-eastern building in the north-western corner of the site remains classified as flood storage under post development conditions. Notes there are similar conditions for other buildings in the area which should be explained. It should be confirmed that the buildings were indeed blocked out from the model, otherwise the impact assessment would not be	The final integrated water management strategy implementation report has been updated to include further discussion of the methodology used, to provide clarity regarding this matter.

Submitter	Theme	Summarised Submission Comment	Department Response
		representative of final developed conditions.	
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	Notes the terms “fill area” and “building footprint” appear to be used interchangeably, but a building footprint would require exclusion from the model, while a fill area only requires raising of ground levels. If no buildings were blocked out from the model, then further modelling is required with buildings blocked out to understand the true impacts of the proposal, instead of those arising from only earthworks. The extent/depth of fill should also be elaborated on, particularly where impacts are caused at the north-western corner of the site as the numbers on Figure 5.1 may show depth of fill, however this should be explicitly stated.	The terms in the integrated water management strategy implementation report have been reviewed and updated to ensure consistency and clarity. The building footprints were raised and therefore blocked in the model to the level stated in the report.
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	Notes the Probable Maximum Flood Event (PMF) has not been modelled. States that this is a significant omission, with only one figure showing existing PMF depths in the water management report Appendix B. Modelling for the PMF is required and maps for all relevant parameters should be included. An impact assessment of the proposed development is also required. Recommends the performance criteria should also consider flood level impacts in the PMF, not only changes in hazard, especially where existing	The final integrated water management strategy implementation report now includes modelling of the PMF – discussion on the modelling is included in the body of the report, and maps are provided at Appendix C of the report. Performance criteria has included the PMF.

Submitter	Theme	Summarised Submission Comment	Department Response
		development types warrant this consideration.	
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	Recommends the water management report should include a preliminary analysis regarding the Local Planning Direction. The analysis should identify, for example, that intensification is proposed and that this would require detailed justification in the future flood and risk impact assessment.	This analysis has now been undertaken and is provided in Section 2.1.6 of the final integrated water management strategy implementation report.
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	Comments the place strategy includes an evacuation route to the southeast, over Duck River. While this route and creation of a new bridge over Duck River at this point appears to be a solution, consideration must also be given to the onward evacuation route(s) from this new bridge and ultimate destinations. There is the risk that evacuees are placed at even greater risk than if they had not tried to evacuate. Similarly, evacuees from existing areas along the evacuation route should not be placed at greater risk due to the proposal and its new evacuation route.	Noted. The department has been liaising with the NSW State Emergency Service (SES) on this matter, and it has been agreed that the SES will undertake an evacuation study that considers the flood risks for the precinct as part of the rezoning process. This is included as an action 5.17 in the place strategy.
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	EES supports adopting the 1% annual exceedance probability flood event, plus climate change, as the defined flood event for flood planning purposes for the precinct. EES also supports avoiding fill within 'high hazard' areas, noting these appear to encompass floodways.	Noted.

Submitter	Theme	Summarised Submission Comment	Department Response
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	EES notes that the draft updated Flood Risk Management Manual is on public exhibition until April 4, 2022. For convenience, under Section 2.1.6, it should be noted that the required flood and risk impact assessment to justify inconsistency with the Local Planning Direction would need to comply with the final version of the draft new Flood Risk Management Guide LU01 “Flood Impact and Risk Assessment”.	The integrated water management strategy implementation report has been updated to note that the 2022 update to the NSW Floodplain Development Manual has been publicly exhibited, and that the future precinct wide flood risk management study will need to be prepared in accordance with the latest edition of the manual available at that time.
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	EES supports the incorporation of the principles of water-sensitive urban design, water reuse and management to improve the water quality outcomes of the surrounding waterways and catchments. EES considers that the place strategy should ensure that identified strategies for achieving or improving water quality targets associated with stormwater management in the precinct, in particular in relation to identified industrial use areas, are implemented.	<p>The strategies for improving water quality were considered as well as the existing contamination risks across the precinct. Further assessment to provide a contamination/flooding/WSUD suitable strategy, and approaches to ensure this is implemented, will be undertaken as part of the rezoning process.</p> <p>Additional planning controls have been inserted into Section 8 of the final place strategy to provide further emphasis on this matter. They are:</p> <ul style="list-style-type: none"> • Identify stormwater infrastructure that considers the connections of the traditional owners to the surrounding waterways • Ensure development is designed to meet the NSW Government’s Water Quality Objectives for Parramatta River and contribute to the aspiration of the Parramatta River Catchment Group’s vision for a swimmable river • Develop strategies for achieving or improving water quality targets associated with stormwater management in the precinct.

Submitter	Theme	Summarised Submission Comment	Department Response
DPE Environment, Energy and Science	Environment – IWCMS (including Flooding)	Recommend including a reference to electric vehicle (EV) charging infrastructure in the third strategic direction “Improve access and sustainable travel options and choices” (pg. 8). The draft Design and Place State Environmental Planning Policy (SEPP) 2021 proposes that specific buildings must also be electric vehicle ready by 2023. Although not yet in effect, this should be considered. This is also referenced in the accompanying draft Urban Design Guide relating to the SEPP, which specifies that developments over 1ha must “integrate and prioritise electric vehicle charging car spaces in key public locations”	Additional references to the provision of electric vehicle charging infrastructure, both in private buildings and the public realm, have been inserted into the final place strategy document.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend targeting net zero emissions by 2040 (pg.8). The State is aiming for net zero emissions across all of NSW by 2050, however a new and well-designed precinct could realistically achieve that goal earlier. To achieve this goal, all buildings should be ‘net zero ready’ by 2035, meaning they have sufficient infrastructure and space allocation to shift away from fossil fuel energy by 2035. EES also recommends including electrification as a key approach to enabling net zero. Related to this, but not mentioned in the place strategy, is embodied emissions. Net zero / whole of life embodied emissions for the precinct is important and would be a suitable objective by 2050.	We have examined this and confirmed that an earlier target is achievable. Accordingly, the final place strategy includes a net-zero-ready target of 2040. Refer Section 4.2.4 of this report. Investigation of embodied emissions was beyond the scope of studies for the place strategy; however, this could form part of investigations for the rezoning process.

Submitter	Theme	Summarised Submission Comment	Department Response
		There is currently no policy regarding this, but it is worth addressing as a new and advanced precinct.	
DPE Environment, Energy and Science	Environment – Sustainability	On Page 9 of the place strategy, under the sub-heading ‘The backyard’, EES recommends replacing the phrase ‘has the potential to’ with ‘will’ in the statement “ <i>Leveraging its strategic location within the Central River City, this sub-precinct has the potential to build on energy, recycling and water infrastructure to become an innovative circular economy precinct.</i> ” (emphasis added for clarity)	This proposed change has been included in the final place strategy.
DPE Environment, Energy and Science	Environment – Sustainability	Recommends referencing the NSW Waste and Sustainable Materials Strategy 2041 in the seventh principle dot point. For instance, “Support synergies in water, waste, energy and transport services in line with the NSW Waste and Sustainable Materials Strategy 2041 and circular economy principles so those industries can continuously evolve...”. (pg.42)	This proposed change has been included in the final place strategy.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend mentioning the NSW Waste and Sustainable Materials Strategy 2041 in the first paragraph of the right column. For instance, “Similarly, activities that recycle and supply building material and support development and infrastructure delivery across Greater Sydney are expected to remain in the precinct, while adhering to the NSW Waste and Sustainable Materials Strategy	Reference to the NSW Waste and Sustainable Materials Strategy 2041 has been added to Action 2.2.

Submitter	Theme	Summarised Submission Comment	Department Response
		2041 and circular economy principles.” (pg.42).	
DPE Environment, Energy and Science	Environment – Sustainability	Recommend including a reference to the NSW Electric Vehicle Strategy and electric vehicle charging infrastructure in this section about parking and car share. One of the principles of the Electric Vehicle Strategy is to reduce barriers to electric vehicle take up, which dedicated electric vehicle parking spaces and charging infrastructure would help to achieve (pg.46)	Reference to the NSW Electric Vehicle Strategy has been added into the final place strategy. References to electric vehicle charging infrastructure have been added where relevant.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend referencing the draft State Environmental Planning Policy (Design and Place) 2021 and the accompanying draft Urban Design Guide. For instance, the opening paragraph could include, “Housing will support the cost of improved local connectivity and environmental improvements, while adhering to the draft State Environmental Planning Policy (Design and Place) 2021.” (pg.49).	Not applicable. The NSW Government determined not to proceed with the draft State Environmental Planning Policy (Design and Place) 2021.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend including an additional principle lifted from the draft Urban Design Guide, which accompanies the draft SEPP (Design and Place) 2021. That principle is “deliver sustainable and greener places.” The remaining principles already listed overlap with those in the guide. (pg.50)	The existing principles in the place strategy cover the strategic intent of this statement.
DPE Environment,	Environment – Sustainability,	Recommends discussing what net zero means for the precinct in the initial text and including a section to expand upon	As discussed above, the net-zero-ready target for the precinct has been updated to 2040 in the final version of the place

Submitter	Theme	Summarised Submission Comment	Department Response
Energy and Science	Urban Design – General	embodied emissions. Notes a target of reaching net zero emissions by 2040 and net zero embodied emissions by 2050 would be suitable, and suggests a range of renewable energy generation, building certification, and offset mechanisms that could assist in achieving this goal. Notes that determining what net zero looks like for this precinct may require an environmental report to be commissioned to establish what is feasible. (pg.58)	strategy document. Refer Section 4.2.4 of this report. Approaches for achieving this target, including considerations of embodied emissions, will be considered un further detail as part of the rezoning and development processes.
DPE Environment, Energy and Science	Environment – Sustainability	Recommends referencing the NSW Electric Vehicle Strategy in principle 3 and dedicating car parking spaces for electric vehicle charging that will encourage the take up and use of electric vehicles(pg. 58).	Reference to the NSW Electric Vehicle Strategy and to electric vehicle charging infrastructure have been added into the final place strategy.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend referencing the NSW Circular Strategic Plan and the NSW Waste and Sustainable Materials Strategy 2041 (pg.59)	References to these documents have been included in the Sustainability Principles under Strategic Direction 5 in the final place strategy.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend that Action 2 under the Sustainability section is amended to include other strategies to address the outcome of drought and urban heat resilience at the rezoning stage. (pg.59)	Action 2 (Action 5.8 in the final place strategy) under Sustainability was not considered the appropriate location for this reference. Instead, the Principles under the Landscaping and Ecology section have been updated to amend and add principles that address these matters.
DPE Environment, Energy and Science	Environment – Sustainability	Supports the consideration of climate projections in planning and sea level rise and design for flooding especially the long-term considerations (pg.62)	Noted.

Submitter	Theme	Summarised Submission Comment	Department Response
DPE Environment, Energy and Science	Environment – Sustainability	Recommends including electric vehicle charging infrastructure to encourage the use of EVs in the precinct. (pg.80)	As mentioned above, references to electric vehicle charging infrastructure have been included in the final place strategy.
DPE Environment, Energy and Science	Environment – Sustainability	Recommend referencing the draft Design and Place SEPP 2021 and the accompanying draft Urban Design Guide in the 'Other planning controls' list. (pg.83)	Not applicable. The government determined not to proceed with the draft State Environmental Planning Policy (Design and Place) 2021.
DPE Environment, Energy and Science	Environment – Sustainability	<ul style="list-style-type: none"> EES notes that a number of crossings of Parramatta and Duck River are proposed as part of the place strategy. EES considers the number of watercourse crossings should be minimised, the crossings located to avoid disturbance to/removal of existing native vegetation and should be designed to minimise impacts. The submission from EES provided a list of recommendations regarding the siting and design of river crossings 	Noted. The number and location of river crossings will be examined as part of the rezoning process. All river crossings will be designed to minimise impacts and in accordance with any necessary approvals as part of their development.
NSW Department of Primary Industries – Fisheries Division (DPI Fisheries)	Environment – Ecology	Highlights Parramatta and Duck Creek as key fish habitat and notes that future development work may trigger the <i>Fisheries Management Act 1994</i> . Recommends planning controls adopt the Department of Primary Industries Fisheries Policy and Guidelines for Fish Habitat Conservation Management (2013).	Additional references have been inserted into the final place strategy and ecological implementation report have been updated to emphasise the importance of these key fish and frog habitats.

Submitter	Theme	Summarised Submission Comment	Department Response
DPI Fisheries	Environment – Ecology	Requires that active transport routes be outside of the riparian zone of the waterways.	<p>Active transport routes will be constructed in accordance with the NSW Natural Resources Access Regulator’s <i>Guidelines for controlled activities on waterfront land – Riparian corridors</i> (May 2018). This Guideline states that “Cycleways or paths no wider than four metres total disturbance footprint can be built in the outer 50 per cent of the VRZ [Vegetated Riparian Zone]”.</p> <p>Infrastructure will be designed to minimise impact on riparian areas, and all necessary approvals will be obtained for any applicable infrastructure.</p> <p>Refer ecological implementation report for further detail.</p>
DPI Fisheries	Environment – Remediation	Supports the integration of precinct-wide remediation measures.	Noted.
Endeavour Energy	Environment – Sustainability	Supports the net zero ambition for the precinct and welcomes further discussion with the department on this topic. Notes that Endeavour Energy has a net zero strategy in place for operations as well as enabling customers to achieve a net zero. Notes there are many elements to potential solutions including renewable energy generation, energy storage, microgrid/embedded networks, electrification of transport and building efficiency standards.	Noted. The department will explore options for precinct-scale renewables in collaboration with utility providers as per Action 5.7 of the place strategy.
Endeavour Energy	Infrastructure – Utilities	Confirms that capacity is available in the network in the short to medium term to supply the proposed development from the existing Rosehill Zone Substation.	These matters are addressed in Section 4.1.3 <i>Existing load demand (winter and summer)</i> and Section 5.7 <i>Summary of key findings</i> of the utilities infrastructure implementation Report.

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>In the long term, existing capacity could supply approximately two-thirds of the proposed development, with augmentation of the Rosehill Zone Substation or the running of new feeders from the East Parramatta Zone Substation (to be established) to the proposed town centre required to provide sufficient capacity.</p> <p>Notes there may also be a requirement to establish a new zone substation, preferably adjacent to the proposed town centre, to assist management of the substantial increase in load. This is dependent on the degree of load growth, and Endeavour Energy would appreciate any early information regarding proposals for the usage of land marked as "Investigation site" and forecasts on rates of development to determine the timing for investment.</p>	<p>The department will continue to consult and liaise with Endeavour Energy in the rezoning process.</p> <p>A new action (Action 4.9) has also been included to recognise the importance of ongoing coordination between the department, utility providers and landowners and developers – <i>‘Continue to ensure adequate provision and operation of existing and new utility infrastructure’</i>.</p>
Endeavour Energy	Infrastructure – Utilities	Notes developers will be responsible for arranging electrical reticulation and connection works via Accredited Service Providers in accordance with Endeavour Energy policy.	Noted. To ensure clarity this statement has been added into <i>Section 5.7 Summary of key findings</i> of the final utilities infrastructure implementation report.
Endeavour Energy	Infrastructure – Utilities	Notes significant coordination between Transport for NSW and Endeavour Energy has occurred and will need to continue for the Parramatta Light Rail and Sydney Metro West projects. This is with regard to capacity upgrades, protection and relocation of critical assets. Notes coordination with other infrastructure providers	Noted. A new action (Action 4.9) has been included to recognise the importance of ongoing coordination between the department, utility providers and landowners and developers <i>‘Continue to ensure adequate provision and operation of existing and new utility infrastructure’</i> .

Submitter	Theme	Summarised Submission Comment	Department Response
		including Sydney Water and Jemena for growth in Western Sydney.	
Endeavour Energy	Infrastructure – Utilities	Notes major 132kV and 33kV transmission underground cables on Unwin St and future 132kV transmission cables are planned to run North along Colquhoun St then East along Grand Avenue. Requests Endeavour Energy be consulted further if there are planned upgrades to these roads. In particular, Endeavour Energy should be contacted if there are any opportunities to lay new ducts along Unwin St as all four 132kV cables along Unwin St are oil-filled cables that will eventually require replacement based on end-of-life or capacity constraints.	Noted. This feedback has also been forwarded to Transport for NSW and Sydney Metro for their consideration, given planned works to realign Unwin Street.
NSW Environment Protection Authority (NSW EPA)	Environment – Remediation	Suggests amending the third sentence under the sub-heading "Contamination" (pg. 29) of the draft place strategy, as the current wording implies that the only sites requiring remediation or management for contamination are those notified to or regulated by the EPA under the CLM Act. The true extent of contamination across the wider area of the site will only be known once further assessments of sites are undertaken as part of the broader strategy.	Refinements made to wording in the final place strategy and agreed with the EPA. For reference, new wording is: <i>'The majority of sites in the precinct are affected by contamination, and multiple sites are subject to an instrument under the Contaminated Land Management Act 1997 requiring management of contamination or are identified as notified or regulated sites.'</i>
NSW EPA	Environment – Remediation	The EPA made a number of further requests for amendments to the text of the place strategy, namely:	The proposed amendments are accepted and have been included in the final place strategy.

Submitter	Theme	Summarised Submission Comment	Department Response
		<ul style="list-style-type: none"> • Amendment to the second paragraph under the Sub-heading "Contamination" (pg.29) of the draft place strategy follows, "Shallow groundwater is a common feature in many areas across the precinct and is contaminated due to legacy contamination." It is noted the term "in many cases" in the current narrative would benefit changing as it implies groundwater is a stable source located in individual places. • Suggests moving the fifth paragraph under the sub-heading "Precinct-wide remediation strategy" (pg.55) of the draft place strategy to after the dots points in this section and amend the wording to provide clarity that the adoption of new or alternative technologies is not being prohibited and can be used if the applicant can demonstrate that the technology is viable on an individual site basis and consistent with the guiding principles of this strategy. • Suggests amending the following sentence under the sub-heading "Precinct-wide remediation strategy" (pg.55) of the draft place strategy to include the text in italics and underline: "Generally, individual landowners <i>and future site developers</i> will be responsible for remediation 	

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>of their properties, including adjacent foreshore areas, as part of their redevelopment."</p> <ul style="list-style-type: none"> • Amendment to the first sentence in the second paragraph under Sub-heading "Precinct-wide remediation strategy" (pg.56) of the draft place strategy follows, "The oversight for the remediation requirements for the contaminated land across the precinct will shared by the department, City of Parramatta Council and the NSW Environment Protection Authority" • Amendment to the "Precinct-wide Remediation Strategy" Action 1 dot point 4 follows, "Precinct-wide hydrogeological and groundwater quality including but not limited to chromium, chlorinated hydrocarbons (for example DNAPL) and petroleum hydrocarbons (for example LNAPL)" • Amendment to the "Precinct-wide Remediation Strategy" Action 3 follows, "Review options including treatment and reuse to accommodate surplus spoil (soil/fill) within the precinct" • Amendment to the "Precinct-wide Remediation Strategy" Action 3 follows, "Work and consult with landowners and developers to stage remediation appropriately." 	

Submitter	Theme	Summarised Submission Comment	Department Response
NSW EPA	Environment – IWCMS (including Flooding)	<p>It is noted that the design principle to “Improve the water quality of the surrounding waterways and catchments” is supported and compliments key Planning Priorities for water in the Central City District Plan. The Strategy would benefit recognising these key priorities and actions and how the strategy is helping to support other key initiatives for the Parramatta River including the ‘Our Living River’.</p> <p>To support Action 62 in the District Plan it’s recommended that the supporting planning and design controls recognise and adopt the Risk-based Framework for Considering Waterway health Outcomes in Strategic Land-use Planning Decisions (OEH/EPA 2017).</p>	<p>The proposed amendment is accepted. Action 5.15 in the final place strategy has been updated to add references to the <i>Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions, Central City District Plan, and Duba, Budu, Barra: Ten Steps to a Living River – the Parramatta River Masterplan</i>.</p>
NSW EPA	Amenity – Land Use Conflict, Planning Controls – Development Controls	<p>As the proposed town centre will be in the vicinity of a range of land uses, design features are important to minimise noise, air, vibration, hazard risk and visual impacts. Supporting planning and design controls would benefit strengthening to include the role of design excellence. A complimentary approach could be used where industry could use architectural and precinct design to help minimise the risk of urban hazards and deliver desired liveability outcomes as this will be further warranted especially where high-rise development is proposed in this mix of development.</p>	<p>Agreed. To address this, identification of design features that work to minimise land use conflicts and ensure amenity has been added to the Planning and design control section of the final place strategy, under the Strategic direction 4 subsection.</p>

Submitter	Theme	Summarised Submission Comment	Department Response
NSW EPA	Amenity – Air and Odour, Amenity – Noise, Infrastructure – Utilities – SPS 067	Require the implementation of buffers around the operational SPS067. Additional odour and noise mitigation measures should be investigated given the potential encroachment of sensitive residential receivers.	<p>The department agrees with the need to implement a buffer around SPS067. We have included an additional action (Action 4.4) in the strategy to undertake further consultation with Sydney Water to investigate additional measures to mitigate odour from Sewage Pumping Station 067 and confirm exact odour buffers.</p> <p>As identified in the noise and vibration implementation report. Noise from the existing Sydney Water pumping station appears to be minimal. If impacts were identified in the future, these would be relatively simple to mitigate through the installation of insulation or other architectural building treatments to the pump house building. This will be investigated further as part of developing planning controls for the precinct.</p>
NSW EPA	Place Strategy Process – Governance	Recommends an amendment to ‘key actions’ under ‘strategic directions’ to clearly identify a key lead and partners (in separate columns) to benefit delivery of actions outlined in the Strategy. Notes the establishment of such an anchor would remove any potential confusion and uncertainty in understanding roles and responsibilities where the table could also recognise a range of key partners.	We agree that this approach provides greater clarity regarding roles and responsibilities. This change has been implemented throughout in the final place strategy.

Other Stakeholder Organisation Submissions

Table 10: Responses to Other Stakeholder Organisation Submissions

Submitter	Issue	Summarised Submission Comment	Department Response
<p>Dharug Strategic Management Group</p>	<p>Connecting with Country, Place Strategy Process – Governance</p>	<p>States that there is an impatience in the way urban development unfolds across Dharug Nura and that priority is given to profit over issues of affordability, sustainability, justice and community. The deadlines for approvals processes mitigate against building understanding of the implications of proposals.</p>	<p>There will be multiple opportunities throughout the full planning process for further engagement, building on that undertaken through the process to date. This includes a commitment from the department to ensure that Connecting with Country activities are meaningfully continued beyond the place strategy.</p>
<p>Dharug Strategic Management Group</p>	<p>Connecting with Country, Place Strategy Process – Engagement</p>	<p>Notes that the draft place strategy states that the “Connecting with Country process has run in parallel with the development of the draft strategy” and raises concerns that this will mean the recommendations of the Connecting with Country report will be reduced to tokenistic acknowledgement.</p> <p>The submission raises concerns that the reference to the ‘parallel’ process risks leaving the important insights and recommendations in some sort of Parallel universe that never intersects with the practice and realities of the development process.</p> <p>Dharug Strategic Management Group (DSMG) is also concerned the draft place strategy will continue the developmentalist colonial vision that allows a generic and token acknowledgement of “Aboriginal people” but denies the realities of protocols of knowledge and responsibility for Country.</p>	<p>Regarding the Connecting with Country process running in parallel – the intent of this was to ensure an appropriate process of engagement could occur with the Aboriginal community, that was not tied to the timeline and commitments required by the 'enquiry by design' process, so that the stakeholders involved could have appropriate amounts of time to consider and contribute.</p> <p>The risk of tokenism is acknowledged, and it will continue to be actively managed to ensure that outcomes are meaningful, impactful, and not tokenistic. The engagement process implemented to date has been substantial and follows all best practice considerations, including the recent Government Architect Guidelines. The place strategy includes an action (Action 1.1) that commits government and industry to ensuring Connecting with Country activities are meaningfully continued beyond the place strategy through a Community Reference Group.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
Dharug Strategic Management Group	Connecting with Country	DSMG stands with our sister organisations across the Dharug community in wanting to contribute to the healing of and caring for Dharug Nura and stand ready to participate in the proposed Community Reference Group and to actively lead and support action to heal and care for this precious place.	DSMG has been contacted and will be invited to participate in the Community Reference Group.
Dharug Strategic Management Group	Connecting with Country	Recommends the place strategy must begin, end and be accountable to Country. This should be a strategy about Nura and it should never be reduced to the alienating acronym “GPOP” as it seems so disrespectful and erases the many named places and places whose names have been lost. This is Burramattagal Nura, not Greater Parramatta Olympic Peninsula; not Camelia–Rosehill. Part of the healing of Nura will involve the nurturing of Dharug capacity as part of place strategies.	GPOP is a geographical area comprising land from Parramatta to Sydney Olympic Park and is described in state planning documents. The place strategy has been updated to recognise this is Nura (Country) of the Burramuttagal yura (people). Additionally, the naming of places using Dharug language is a strategy for Connecting with Country and will be investigated further as part of the rezoning and development processes.
Dharug Strategic Management Group	Connecting with Country, Place Strategy Process – Implementation	Comments that a Community Reference Group (if it is established) will be tokenistic rather than decisive or even influential.	<p>The engagement process implemented to date has been substantial and follows all best practice considerations, including the recent Government Architect Guidelines. The place strategy includes an action (Action 1.1) that commits government and industry to ensuring Connecting with Country activities are meaningfully continued beyond the place strategy through a community reference group.</p> <p>The place strategy identifies (Action 1.9) that protocols will need to be established to guide future consultation. This will include terms of reference and consideration of cultural protocols and positioning it as a group with</p>

Submitter	Issue	Summarised Submission Comment	Department Response
			influence over the process. Refer Section 4.10 of this report.
Dharug Strategic Management Group	Connecting with Country, Place Strategy Process – Implementation	Notes the expectation that we can volunteer responses to government and developer timetables is unfair and unrealistic.	We recognise and agree that the time and expertise that Aboriginal stakeholders bring and the cultural knowledge they provide has value. Payment for that time and expertise demonstrates a respect for that knowledge. Aboriginal stakeholders involved in the Connecting with Country process so far have been paid for their time and expertise. This is addressed within Section 4.10 of this report.
Dharug Strategic Management Group	Connecting with Country, Place Strategy Process – Implementation	Notes the Camellia–Rosehill Place Strategy is a long-term project in which there is time to listen, support and engage with Dharug community and organisations to celebrate and support reconnection with Country that has been so badly treated under industrial, commercial and governmental stewardship for so long.	Agree. There is plenty of time to further develop meaningful relationships between Dharug community and government as this project develops. The Community Reference Group will help to solidify those relationships.
Western Sydney University	Traffic and Transport – PLR	Notes the PLR alignment running along South Street (PLR’s preferred alignment – 2A) would provide the most benefits when considering both Camellia and Rydalmere precincts. Camellia will be serviced from the already approved PLR stop, and Options 2B and 2C connect through industrial land of huge holdings. Option 2A provides greater connectivity with the campus and industrial/commercial sites within Rydalmere. Recognising the critical need for connectivity across precincts, the University is also supportive of the opportunity to consider a bridge connection across the Parramatta River, extending from Camellia–	This feedback is noted and has been provided directly to the Parramatta Light Rail team in Transport for NSW. For additional discussion of this issue, please refer to Section 4.1.2 of this report.

Submitter	Issue	Summarised Submission Comment	Department Response
		Rosehill to the campus to deliver bus services between the precincts.	
Western Sydney University	Planning Controls – Land Use, urban Design – General	Careful consideration of the built form, landscape, and view lines to and from the site is required for the interface of the proposed development with Parramatta River and the heritage context of the University's listed campus. Recommends appropriate built form and design for the river frontage, along with visual connection and continuity in the landscape will be important to the precinct's adjacency with the Parramatta South campus	Agreed. The integrated master plan includes design principles that recognise the importance of the river and the heritage context of the area. Planning and design controls will be further developed as part of the rezoning process.

Industry Group Submissions

Table 11: Responses to Industry Group Submissions

Submitter	Theme	Summarised Submission Comment	Department Response
Business Western Sydney	Place Strategy Process – Governance, Place Strategy Process – Implementation	Considers a strong governance structure/coordination body should be established to implement the final version of the Camellia–Rosehill Place Strategy with clear timeframes guiding the achievement of major milestones and activation of the Precinct.	<p>Agreed. The place strategy recognises that strong governance is required to implement the place strategy and that collaboration will be critical to the success. Given that there is very limited government land within the Precinct there does not exist a basis for the establishment of a bespoke redevelopment/ governance authority. However, a project control group for the place strategy will provide a coordination role and clear governance structure to lead the implementation of the strategy. The project control group will involve all relevant state and local government agencies, including City of Parramatta Council, Transport for NSW and School Infrastructure NSW. The implementation approach is discussed further in Section 9 of the place strategy.</p> <p>The place strategy also identifies (Action 5.2) the potential to investigate whether there are opportunities for one government agency/organisation to manage contamination, and the viability of this will be examined prior to the rezoning stage.</p> <p>Timing for the implementation of the place strategy will be impacted by who is responsible for leading the rezoning and timing of infrastructure work and future strategic businesses case/s. Further information regarding timing will be provided at a later stage.</p>
Business Western Sydney	Development – Yield, Economy – Employment, Traffic and Transport – PLR	Increase the residential and employment targets for Rosehill–Camellia to ensure that it can meet its full potential as a location for homes and jobs	Capacity for jobs has increased to 15,400 jobs, up from 14,500 jobs in the draft strategy as a result of changes to development standards for the urban

Submitter	Theme	Summarised Submission Comment	Department Response
		located in proximity to the Parramatta CBD and serviced by PLR Stage 1 & 2.	<p>services precinct. Refer section 4.4 of this report for further detail.</p> <p>The place strategy and supporting technical studies clearly set out the constraints that have dictated the cap on residential development (10,000 dwellings) and the necessary infrastructure (particularly sufficient social infrastructure) required to support this. Refer section 4.7.2 of this report for further detail.</p>
Business Western Sydney	Traffic and Transport – PLR	Support the extension of the Parramatta Light Rail Stage 2 and determination of the final preferred alignment through the area	Noted. Refer Section 4.1.4 of this report.
Business Western Sydney	Infrastructure – Funding and Delivery, Place Strategy Process – Implementation	Identify and partner with the private sector on community and transport infrastructure in the Camellia–Rosehill Precinct.	The place strategy highlights the need to, and importance of, collaboration with the private sector. Further consultation and collaboration will be undertaken throughout the rezoning process and in developing the infrastructure framework and beyond.
Business Western Sydney	Planning Controls – Land Use	Notes ATC lands immediately adjacent to Rosehill Gardens Racecourse present a unique opportunity to facilitate ‘the gateway’ to the new Camellia Town Centre to be underpinned with residential, entertainment, employment, and mixed uses activities.	Noted. The final place strategy includes open space at the Grand Avenue entrance to the precinct to capitalise on this opportunity to deliver a ‘gateway’ experience with strong connections to the mixed use town centre and entertainment precinct.
Business Western Sydney	Social Infrastructure – Open Space	Comment ATC’s large land holdings provide ‘open space’ opportunities to support and realise public realm creation for the benefit of the local community.	Noted.

Submitter	Theme	Summarised Submission Comment	Department Response
Business Western Sydney	Development – Staging	Support the rezoning and activation focus on ATC lands as part of the Stage 1 strategy given this is the least constrained (i.e. lower contamination effected). Notes this may assist NSW Government’s ability to engage with ATC to strategically progress planning of new traffic and transport solutions for the Precinct.	The staging plan in the final place strategy has been updated to recognise the ability of some sites to progress earlier, while also recognising that base infrastructure will need to be in place to support this (social and transport). Refer Section 4.7.1 of this report for further detail.
Business Western Sydney	Traffic and Transport – Parking – Decoupled Parking	Considers that it is unclear how completely decoupled parking will impact the feasibility of housing development in the precinct. Large separate multistorey parking structures would be to the detriment of urban design quality. Reconsider the proposal to decouple parking and work with industry on future solutions to provide the right car parking for different members of the local community based on their needs.	The provision of decoupled parking in separate structures has been removed from the master plan and place strategy. Refer Section 4.1.7 of this report for further detail.
Business Western Sydney	Housing – Diversity, Place Strategy Process – Implementation	Recommends that the department work with industry to provide planning controls to provide for a diverse housing mix and tenure type.	The place strategy has been updated to identify potential housing typologies to be investigated as part of the rezoning process including affordable housing (5 to 10%), build-to-rent, student accommodation, co-living, and a mix of apartment types. Refer Section 4.12 of this report for further detail. Opportunities for collaboration and consultation with industry on this will occur as part of the process.
Business Western Sydney	Development – Staging, Social Infrastructure – Open Space	Opportunities need to be explored to bring forward foreshore public access at Camellia–Rosehill sooner rather	The department will investigate how foreshore access will be delivered as part of the rezoning process.

Submitter	Theme	Summarised Submission Comment	Department Response
		<p>than later. Notes opening the foreshore to the public on the southern side of the Parramatta River would greatly enhance community benefit across Greater Parramatta.</p>	<p>This will include determination of appropriate staging/sequencing of public spaces and integrated pedestrian/cycle links along the foreshore. Some foreshore land is already in public ownership and there is potential opportunity for this to be embellished and opened up to the public early.</p> <p>The NSW Government recently committed \$60 million in the 2022-23 Budget to kickstart the CBD to Parramatta active pathway which could also assist in realising this.</p> <p>Refer Section 4.3.2 of this report and Action 4.8 of the place strategy.</p>

City of Parramatta Council submission

Table 12 Responses to issues raised in City of Parramatta Council's resolution 14 March 2022 (F2021/00521 – D08386208)

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Infrastructure funding and delivery, Development – Staging	Draft place strategy and master plan do not provide sufficient detail and certainty that adequate infrastructure will be provided aligned with growth and delivered in a suitably staged manner.	<p>As a high level strategic study, the place strategy and supporting studies identify the necessary infrastructure and the timing of this (refer Staging Plan in place strategy) to ensure that necessary infrastructure is provided at the appropriate time to support growth.</p> <p>Detailed staging will be further investigated as part of the rezoning, developing infrastructure framework and strategic business case process.</p> <p>Refer Section 4.5.1 and 4.7.1 of this report for further detail.</p>
City of Parramatta	Infrastructure funding and delivery	Draft place strategy has not addressed the funding gap of approximately \$416 million identified in the Infrastructure Delivery Plan which could be in the region of \$1.47 billion when taking into account remediation costs and the extent of contributions that can be reasonably expected to be collected under a new Contributions Plan (CP).	<p>The infrastructure development plan and place strategy clearly identifies future rezoning will be supported by an infrastructure framework and strategic business case /s (subject to the availability of funding) – that will confirm costs and lock in funding sources.</p> <p>Refer Section 4.5.1 of this report and the infrastructure delivery plan for further detail.</p>
City of Parramatta	Contamination and remediation	The precinct-wide remediation strategy does not include sufficient details of the extent of capping, remediation staging, governance and funding arrangements. This must be sufficiently detailed and agreed upon by key government stakeholders prior to settling on land.	<p>The precinct wide remediation strategy has been amended to include further details on capping (Section 5.2) and remediation staging (Section 9).</p> <p>Action 5.2 of the place strategy identifies that further governance mechanisms for precinct-wide remediation and/or contamination management activities will need to be investigated as part of the rezoning process along with exploring opportunities for the development of a funding</p>

Submitter	Issue	Summarised Submission Comment	Department Response
			<p>framework, including mechanisms that would help support the implementation of groundwater remediation.</p> <p>Further discussions will be held on governance and funding arrangements; and responsible authorities confirmed as part of rezoning process.</p> <p>Refer Section 4.2.1 of this report and the remediation implementation report for further detail.</p>
City of Parramatta	Traffic and Transport	A financially feasible and deliverable traffic and transport solution must be finalised.	<p>The place strategy includes a comprehensive Traffic and Transport Study and multiple options to improve the identified traffic and transport issues. It identifies (at action 3.1) a priority for the preparation of an integrated transport study to further investigate all potential transport investments.</p> <p>The integrated transport study will confirm new and improved transport infrastructure that needs to be delivered to support the renewal of the precinct, as well as the associated costs. This work will inform the future rezoning and development of the infrastructure framework, including any future strategic business cases.</p> <p>Refer Section 4.1 of this report for further detail.</p>
City of Parramatta	Planning controls, Amenity and land use compatibility	Clear and deliverable solutions are required to the significant compatibility issues of locating residential development on a site constrained by significant flooding, contamination, fuel pipeline blast zones, and noise and odour pollution.	<p>Technical studies (strategic flood study, air and odour, contamination, noise and land use safety (hazard risk) have been prepared to inform the master plan and place strategy.</p> <p>These studies identify mechanisms to deal with compatibility issues that have been included in the place strategy (i.e., restricting</p>

Submitter	Issue	Summarised Submission Comment	Department Response
			<p>development within proximity to the fuel pipeline through height and floor space controls) and others under the planning controls section that will be investigated and implemented through a future rezoning process (i.e., remediation staging and sequencing framework to avoid land use conflict).</p> <p>The place strategy also identifies that further precinct-wide flood risk study and plan will be prepared to support a future rezoning along with an Evacuation Study by NSW State Emergency Services. Noise and odour studies have also identified appropriate controls, including a buffer around SPS 067.</p> <p>Refer Section 4.4 and Section 4.8 of this report for further detail.</p>
<p>City of Parramatta</p>	<p>Planning controls</p>	<p>The proposed densities within the town centre with building heights between 80m (24 storeys) to 130m (40 storeys) and floor space ratios between 4.5:1 to 5.5:1 are not supported as they are untested and require detailed modelling that also considers the existing significant environmental constraints.</p>	<p>The proposed densities in the town centre have been informed by technical studies. A benchmarking study undertaken by the master planners to demonstrate that heights, density and open space (as amended) is akin to other urban renewal precincts.</p> <p>We acknowledge that further urban design analysis and master planning is required to be undertaken as part of a future rezoning process. The indicative-built form information has now been removed from the place strategy and master plan; however, the indicative height and floor space ratio controls will be included as this not only provides certainty for landowners' but manages expectations. A note has been included in the planning control section that states-built form will be subject to detailed urban design analysis and flood study.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
			Refer Section 4.4 and Section 4.8 of this report and integrated master plan report.
City of Parramatta	Social Infrastructure	The shortfall of up to 28 hectares of open space, the appropriate location of the K-12 school within or closer to the town centre, and the land allocation for the community hub must be resolved consistent with the requirements of Council's Community Infrastructure Strategy (CIS).	<p>A detailed review of open space has been undertaken in consultation with the project team and other stakeholders, including Council. Changes have been made to improve access and increase provision of open space particularly for the town centre. Overall open space across the precinct has increased from 43.7ha (13.6%) to 54.5ha (16.9%) meeting Council's target of 15%.</p> <p>Preferred location of the K-12 school is now identified as the existing horse stables in the south-west corner of the racecourse, which is contiguous with the mixed use development areas to the west of Rosehill Racecourse and well linked by open space/wilderline and active transport networks to the Town Centre.</p> <p>A 4,300sqm community hub is planned to be located within the town centre. The specific location will be identified through the rezoning process.</p> <p>Refer Section 4.3 of this report for further detail.</p>
City of Parramatta	Planning controls	The proposed master plan must be reconsidered to ensure it delivers the optimal land use mix for the precinct including the provision of higher order employment uses that build upon Parramatta's strong health and education sectors that would provide greater employment density and continue to bolster innovation in Parramatta.	Land use mix, industry clusters and competitive advantage issues were examined as part of economic and land use analysis and involving all stakeholders. Health and education uses were determined as not optimal due to impacts on the Westmead Precinct and the lack of competitive advantage. A cluster of circular economy uses, linked to city building industries and the urban services function were determined to be a

Submitter	Issue	Summarised Submission Comment	Department Response
			<p>more appropriate focus to meet the needs of the Greater Parramatta area and to achieve employment and competitive advantage.</p> <p>Refer Section 4.4 of this report and economic analysis for further detail.</p>
<p>City of Parramatta</p>	<p>Density/Scale, yield and feasibility</p>	<p>The review required of the master plan must reconsider the scale of residential development proposed in the north-western part of the precinct, and the associated infrastructure it requires, and place greater focus on the provision of more employment compatible with the changing role of Parramatta.</p>	<p>The place strategy and supporting technical studies clearly set out the constraints that have dictated the cap on residential development (10,000 dwellings) and the necessary infrastructure (particularly sufficient social infrastructure) required to support this.</p> <p>The place strategy not only retains land for industrial uses, but also responds to the evolving nature of industrial precincts throughout Sydney and introduces an urban services component to the precinct that is located adjacent to the Parramatta River and Rosehill Racecourse. This highlights the precinct's central location within the Greater Parramatta and Olympic Peninsula corridor and the need to provide critical services for the burgeoning population in this precinct with a particular focus on the importance of urban services and strategic industrial uses in highly accessible areas. The renewed entertainment precinct will also provide employment opportunities.</p> <p>In all, the place strategy identifies potential floor space ratio and height controls to facilitate a maximum of 10,000 dwellings and 15,400 jobs.</p>
<p>City of Parramatta</p>	<p>Place Strategy process</p>	<p>Requests that the resolution of the matters identified in the submission is fundamental at this stage and must not be avoided by the inclusion of conditions within a</p>	<p>The place strategy identifies that the Department, or the City of Parramatta Council must lead a precinct-wide approach to the rezoning and the final place strategy</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>future Ministerial Direction prior to any rezoning, the consequences of which would lead to considerable delays in future rezonings as well as poor planning and urban design outcomes.</p>	<p>explicitly states that site specific planning proposals will not be considered. This will ensure coordination across government to deliver good place outcomes and address the specific constraints that exist for future Camellia development as part of the rezoning process Refer Section 4.6 of this report.</p> <p>All issues raised by Council have been considered and adequately addressed.</p>
<p>City of Parramatta</p>	<p>Housing and job targets</p>	<p>Advises the NSW Department that sufficient housing and employment lands have been identified in Council’s Local Strategic Planning Statement to meet Department’s identified jobs and dwelling targets for City of Parramatta for the period to 2036 without relying on any development taking place at Camellia–Rosehill.</p>	<p>The Place Strategy is a strategic document that sets a framework for Camellia–Rosehill to play a role in addressing housing and employment demand across the NSW over the next 20 years.</p>
<p>City of Parramatta</p>	<p>Place Strategy process</p>	<p>Requests that the Department ensures that the resultant long–standing problems that have arisen from the shortcomings of the accelerated precinct planning processes adopted for various precincts within the City of Parramatta; such as the lack of transport options at Wentworth Point; lack of employment generation at Epping town centre; and traffic congestion at Granville; are not repeated at Camellia–Rosehill and that the development of the place strategy is founded on comprehensive evidence–based analysis and best practice urban design and planning.</p>	<p>The place strategy has included detailed technical studies addressing all relevant planning considerations and provides a framework including an implementation plan and actions to ensure that matters such as traffic and transport issues, detailed master planning, infrastructure provision and employment delivery will be adequately addressed through the next stage of the process.</p>

Note: The above matters have not been counted under the number of mentions in Table 2 of the Finalisation Report as it forms part of Council’s resolution and issues raised are addressed in the submission below.

Table 13 Issues raised in Council’s submission

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Social Infrastructure – Open Space	Concerned that the draft place strategy does not showcase best practice open space provision and location within a renewal precinct. Recommends that the identified shortfall in open space is rectified. This requires further reviewing land-use/density assumptions to mitigate the shortfall of open space or incorporating additional open space.	A detailed review of open space has occurred in consultation with the project team and other stakeholders, including Council. Changes have been made to improve access and increase provision of open space particularly for the town centre. Refer Section 4.3.2 of this report, landscape implementation report and social infrastructure implementation report for further detail.
City of Parramatta	Social Infrastructure – Open Space	Amend the draft strategy and master plan, identify locations for the following consistent with social infrastructure report: 12 play spaces, an indoor court, two outdoor multi-purpose courts, two fitness stations.	<p>Potential locations for 9 play spaces within all parks, indoor courts outdoor multi-purpose courts, and fitness stations are identified.</p> <p>The place strategy, landscape implementation report and social infrastructure report provides indicative locations for:</p> <ul style="list-style-type: none"> • 9 play spaces located within all parks • 2x double multi-purpose courts located within northern district park 1 • 2x double multi-purpose within southern district park 13. • 1x half court located within northern district park 6

Submitter	Issue	Summarised Submission Comment	Department Response
			<ul style="list-style-type: none"> Indoor court to be investigated within the entertainment or urban services 1x combined sports field (2 soccer+ 1 cricket) <p>The exact locations and design of these will be confirmed through the rezoning and development processes.</p> <p>Refer Section 4.3.2 of this report and landscape implementation report for further detail.</p>
City of Parramatta	Social Infrastructure – Open Space	Amend the draft Strategy and master plan to make provision dog off-leash areas which are becoming increasingly important to the social sustainability of high-density communities.	The potential locations for dog off leash areas is identified in district parks. Refer Section 4.3.2 of this report for further detail.
City of Parramatta	Social Infrastructure – Open Space	Notes the draft Strategy should reconsider the proposed size of open space areas, in particular, Local Park 3 in Figure 53 which is less than 0.3ha. All local parks should not be less than 0.3ha as it needs to be sufficiently sized to be usable open space –consistent with Council's Community Infrastructure Strategy (CIS).	All local parks are above 0.3 ha in size, except local park 2 which is 0.3ha. Refer Section 4.3.2 of this report and to landscape implementation report.
City of Parramatta	Social Infrastructure – Community Facilities, Social Infrastructure – Schools	Concerned that the draft place strategy does not exhibit best practice community or school facilities planning. Ensure community facilities and schools are located close to new residential dwellings.	Investigation sites for schools and community facilities are well located and will be close to new residential dwellings. Refer to Section 4.3.1 and 4.3.4 of this report and social infrastructure implementation report.
City of Parramatta	Social Infrastructure –	Considers that the community hub should be indicated on the draft master	Requirement for a 4,300sqm community hub within the town centre is now identified in the

Submitter	Issue	Summarised Submission Comment	Department Response
	Community Facilities	plan to provide certainty on its location and land take.	place strategy. Refer to Section 4.3.4 of this report and social infrastructure implementation report for further detail.
City of Parramatta	Social Infrastructure – Community Facilities	Notes 4.3ha required for multi-purpose community hub as opposed to 4ha identified in the strategy. Recommends this to include 1,855 sqm library space, 1,954 sqm community and subsidised space and 489 sqm cultural space.	We have clarified with Council this should have been to sqm not ha. Requirement for a 4,300sqm community hub is now identified. Refer Section 4.3.4 of this report for further detail.
City of Parramatta	Social Infrastructure – Schools	Concerned that location of the K-12 school remains unresolved at this stage, noting that there is a demand for a primary school (2ha) and a K-12 school in Camellia.	Preferred location of the K-12 school is now identified as the existing horse stables in the south-west corner of the racecourse. Refer Section 4.3.1 of this report for further detail.
City of Parramatta	Social Infrastructure – Schools	Location of K-12 school south of Unwin St is not suitable given its disconnection from community facilities, inaccessibility and the safety concerns that may arise from heavy vehicles utilising Unwin Street.	See response above. The proposed location is now north of Unwin Street. Refer Section 4.3.1 of this report for further detail.
City of Parramatta	Social Infrastructure – Schools	Ensure that schools are sufficiently sized to provide quality public education and open space.	Both school sites are sufficiently sized. The primary school site is 2 hectares and the preferred location for the K-12 high school site is 5.4 hectares. Both sites exceed SINSW' minimum requirements for standard school site sizes in high-density areas (inclusive of built form and open space). Refer Section 4.3.1 of this report for further detail.
City of Parramatta	Social Infrastructure – Schools	Ensure the suitability of the proposed school sites noting the requirements of the SINSW guidelines.	Consideration has been given to SINSW guidelines. Further detailed assessment of sites against these guidelines will be undertaken as part of the

Submitter	Issue	Summarised Submission Comment	Department Response
			future rezoning process to ensure school sites are suitable in consultation with SINSW. Refer Section 4.3.1 of this report.
City of Parramatta	Social Infrastructure – Schools	Facilitate shared use arrangements for open space and school facilities with the wider community.	SINSW is required to consider shared use arrangements in all school developments. This will be further investigated with SINSW through the rezoning process.
City of Parramatta	Development – Staging, Infrastructure – Funding and Delivery	Considers draft place strategy does not sufficiently align growth with infrastructure. Notes the timing and sequencing for infrastructure delivery needs to be further refined and clarified to support growth over time.	The preliminary staging plan and infrastructure delivery plan provides sufficient detail at this strategic planning phase to ensure infrastructure is provided at the appropriate time to support growth. Refer Section 4.5 and 4.7.1 of this report.
City of Parramatta	Infrastructure – Funding and Delivery, Development – Staging	The IDP is amended to include early delivery of social infrastructure within the short-term period.	Staging Plan (Table 3) in Final place strategy identifies that in the short-term planning and design of social infrastructure and open space will be undertaken and works for such infrastructure to support early-stage development to occur. Refer Section 4.7.1 for further detail.
City of Parramatta	Development – Staging, Infrastructure – Funding and Delivery	Request infrastructure delivery plan is updated to refine timeframes and threshold triggers for infrastructure delivery. Dwelling and/or job numbers should reflect the threshold trigger for infrastructure delivery (e.g., Stage 1 infrastructure is to be delivered at ‘x’ dwellings and will support a maximum of ‘x’ dwellings).	Detailed matters such as threshold triggers for infrastructure delivery will be investigated as part of the rezoning and strategic business case processes.

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Development – Staging	Investigate discrepancies between the Staging Plan contained in the place strategy (Table 3) and the IDP (Table 9) to ensure consistent advice.	Staging Plan updated in the infrastructure delivery plan aligns with the place strategy.
City of Parramatta	Development – Staging, Infrastructure – Funding and Delivery	Notes table 3 of the draft Strategy and the IDP as the proposed staging plan, lacks sufficient detail to guide sequencing of development and infrastructure for the precinct. The proposed staging plan suggests concurrent development of all the sub-precincts.	The place strategy provides a high-level staging strategy to ensure infrastructure is provided at the appropriate time to support growth. Detailed staging to be further investigated as part of the rezoning, developing infrastructure framework and strategic business case process. Refer Section 4.5.1 for further detail.
City of Parramatta	Development – Staging	Requests staging plan clarify: <ul style="list-style-type: none"> How each of the sub-precincts will be staged over time (e.g., phasing of access/road connections and unlocking development in the Town Centre. How many dwellings and/or jobs will be accommodated in each stage; and what specific infrastructure is required to support each stage of development. 	These detailed matters will be investigated as part of the rezoning and strategic business case process, which will also include more detailed master planning of local infrastructure. Refer Section 4.5.1 and 4.7.1 for further detail.
City of Parramatta	Development – Staging, Infrastructure – Funding and Delivery	For sequencing approach: <ul style="list-style-type: none"> Clarify trigger points for when additional infrastructure should be delivered. Provide further detail in the staging plan. Currently it is assumed development will occur concurrently in all sub-precincts. Provide a staging plan for the development of the sub-precincts. 	See response above.
City of Parramatta	Development – Staging, Infrastructure –	Notes the delivery of foreshore access will require further investigation in terms of the appropriate	Agreed. A new action (4.8) has been included under Direction 4 Investigate arrangements for

Submitter	Issue	Summarised Submission Comment	Department Response
	Funding and Delivery, Social Infrastructure – Open Space	staging/sequencing of public spaces and integrated pedestrian/cycle links along the foreshore. Comments that there are potential large tracts of that will not be re-developed however, it is important that where developed is proposed, arrangements are made for the remediation, dedication, embellishment and long-term maintenance of the foreshore area. This will need to be facilitated in an integrated manner with regard to the temporal nature of the development and how the space may be used in the short to long term.	the remediation, dedication, embellishment and long-term maintenance of the foreshore area. Refer Section 4.3.2 of this report and the place strategy.
City of Parramatta	Infrastructure – Funding and Delivery	Concerns are raised regarding the potential funding gap and uncertainty on decontamination cost estimates. Council advised that they bear no unreasonable financial burden in the delivery of infrastructure in the delivery of the infrastructure. Considers that the draft Strategy has not addressed the notional infrastructure funding gap of \$416 million identified in the IDP. Recommends that the next steps for infrastructure planning, in alignment with currently proposed infrastructure planning reforms, and how the funding gap will be addressed.	The place strategy and infrastructure delivery plan have been updated to identify the need for strategic business cases to address the funding gap. Refer Section 4.5.1 of the report for further detail.
City of Parramatta	Infrastructure – Funding and Delivery	Notes the remediation implementation report estimates precinct remediation costs will range between \$350 to \$550m, with foreshore costs ranging from \$28.2 to \$46.7 million equating a maximum total of \$600m which has not been incorporated in the forecasting of infrastructure costs in the infrastructure delivery plan.	The infrastructure delivery plan has been updated to align with the remediation implementation report.
City of Parramatta	Infrastructure – Funding and Delivery	Notes the potential overlap between what can be collected under 'conditions of consent' (\$305.5m) and 'local	Conditions of consent Appendix B was not included with the publicly exhibited

Submitter	Issue	Summarised Submission Comment	Department Response
		contributions' (\$246.3m). Concerned the reference to \$305.5m under conditions of consent is unclear because this may be captured under local contributions.	infrastructure delivery plan as this contains confidential and sensitive information. Appendix B identified projects that were considered to be potential conditions of consent and separate to Council contribution plan items – therefore there is no overlap. Items include utilities, additional internal roads (not in contribution plan) and land for riparian buffer. The infrastructure delivery plan has now been updated to clarify what is covered under the contribution plan and those under conditions of consent.
City of Parramatta	Infrastructure – Funding and Delivery	Concerned that the total infrastructure funding gap can fall in the range of \$1.23 to \$1.47 billion when considering remediation costs (\$550 – \$600m). Notes the lack of clarity on the reference to 'conditions of consent' (\$305.5m), the gap between what can be collected under Council's existing Contributions Plan and what is stated in the infrastructure delivery plan (\$154.8m). Recommends the draft strategy identifies the notional funding gap and the potential actual gap as identified above.	Costs have been reviewed in relation to remediation and confirmation provided that there is no overlap between local contributions plan and conditions of consent. We have also clearly stated the need for strategic business cases to address the estimated funding gap. Refer Section 4.5.1 of this report and infrastructure delivery plan for further detail.
City of Parramatta	Infrastructure – Funding and Delivery	Notes that: <ul style="list-style-type: none"> <li data-bbox="592 1653 1038 2018">Special local rates would be applied for works or services limited to a specific area that will benefit from the proposed infrastructure. This will require an application to the Independent Pricing and Regulatory Tribunal (IPART) and Council agreement/endorsement. 	Agreed. Further work on the special rate levy and implementation will be necessary as part of developing the infrastructure framework. The special rate levy is currently anticipated to collect around \$100m, being less than 5% of the total infrastructure cost. Refer Section 4.5.1 and of this report and the

Submitter	Issue	Summarised Submission Comment	Department Response
		<ul style="list-style-type: none"> The estimated income from the special rates is difficult to determine and requires further investigation. Considers that further investigations on proposed funding mechanisms (e.g., income that could be derived from special local area rates) is undertaken prior to rezoning. 	infrastructure delivery plan for further detail.
City of Parramatta	Infrastructure – Funding and Delivery	Considers that funding arrangements must be resolved and put in place before rezoning of the precinct, to ensure that Council is not unreasonably burdened by any infrastructure funding shortfalls.	Further investigations will be undertaken as part of the rezoning process. Refer Section 4.5.1 and 4.6 of this report for further detail.
City of Parramatta	Infrastructure – General	Considers that a precinct-specific Infrastructure contribution plan be developed prior to rezoning.	Precinct specific contribution plan to be prepared as part of rezoning once infrastructure to be provided is confirmed. Refer Section 4.5.1 and 4.6 of this report for further detail.
City of Parramatta	Planning Controls – Land Use	Concerned that the master plan does not provide for optimal land use mix in the context of maximising jobs. Recommends that the Economic analysis further interrogate the appropriate land use mix for Camellia and consider higher order uses such as health, education and innovation uses to reduce over-reliance on high density residential to fund infrastructure.	Refer Section 4.4 of this report and detailed comment above.
City of Parramatta	Planning Controls – Land Use	Recommends DPE ensure that the SP3 Tourist and Visitor Accommodation zone does not permit other types of residential development apart from short-stay accommodation for the proposed zoning of the entertainment sub-precinct/ Rosehill Racecourse. Notes any additional densities (e.g., should residential flat buildings be made permissible under the SP3 zone)	Residential density in the north west now accommodates local open space and has been reallocated to the entertainment precinct. Overall dwelling cap is at 10,000. Refer Section 4.4 of this report for further detail.

Submitter	Issue	Summarised Submission Comment	Department Response
		will need to be accounted for under planning assumptions and calculating infrastructure demand.	
City of Parramatta	Planning Controls – Land Use	Requests any sites that are proposed to be Council dedicated public space, need to be zoned RE1 Public Recreation.	Public open space proposed to be zoned RE1 Public Recreation. Refer Section 4.4 of this report and Table 1 Proposed land-use zoning and development standards of the place strategy.
City of Parramatta	Place Strategy Process – Technical Studies	Requests planning assumptions underpinning job numbers be clarified. Recommends the draft strategy identify the quantum of different land uses (i.e., quantum of land zoned for heavy industry, urban services, commercial/retail uses) within the precinct and associated planning assumptions (ratio of jobs to floorspace).	Planning assumptions are detailed in the integrated master plan.
City of Parramatta	Place Strategy Process – Technical Studies	Considers that the economic analysis and implementation report should be amended to include the current master plan as shown in the draft Strategy.	The economic analysis and implementation report aligns with the final master plan.
City of Parramatta	Housing – Diversity	Recommends consistency with stated objectives to ensure the delivery of housing diversity in the precinct. Recommends the draft strategy define the desired housing typologies for Camellia.	The place strategy has been updated to identify potential housing typologies to be investigated as part of the rezoning process including affordable housing (5% to 10%), build-to-rent, student accommodation, co-living, and a mix of apartment types.
City of Parramatta	Environment – Ecology, Social Infrastructure – Open Space	Recommends the draft strategy consider a longer-term aspiration for the provision of regional open space in Camellia, consistent with the identified action to facilitate public access to the wetland this environmental asset. Notes the protection and rehabilitation of the	The place strategy has considered appropriate land uses for a 20-year horizon and includes a comprehensive open space strategy, including public access to wetlands (potential to be a regional park). There are

Submitter	Issue	Summarised Submission Comment	Department Response
		wetlands as well as future retrofitting industrial land, could open opportunities for providing significant regional open space for the community in the long term.	limited opportunities to provide additional open space within the industrial precinct, without compromising employment outcomes. Refer Section 4.3.2 of this report.
City of Parramatta	Amenity – Land Use Conflict, Planning Controls – Development Controls	Recommends planning controls relating to land-use conflicts take into account all recommendations of the technical reports as only some of the identified measures have been incorporated into the draft Strategy.	Section 8 of the place strategy text has been updated to identify that this is a preliminary list of planning controls, which may be expanded during investigations for a future rezoning. Refinements have also been made to include specific controls recommended in reports such as the integrated water cycle management strategy.
City of Parramatta	Infrastructure – Digital Infrastructure	Considers that the draft strategy does not include consideration of Smart City initiatives but notes there is a significant opportunity to strengthen the provision of "smart" elements within the draft strategy for Camellia to be new smart urban growth precinct. Notes the precinct is well-positioned to support around 14,500 future jobs to become Smart jobs and 10,000 new homes to be Smart development. Recommends that DPE liaise with the "Smart Places" DPE team to explore potential opportunities relating to Camellia becoming a new Smart urban growth precinct.	The place strategy has been updated to strengthen smart city initiatives in response to feedback from the Department's smart places team. Refer Section 4.5.3 for further detail.
City of Parramatta	Urban Design – Built Form	Considers the poor relationship between the identified principle and proposed spatial outcomes represented in the indicative master plan raises questions to whether the design can be delivered. Comments the gap is due to the fact the	Indicative built form has been removed from the place strategy and further analysis has been undertaken to confirm that proposed land-use controls are feasible. Refer to

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>indicative built form parameters have been canvassed without first resolving feasibility and environmental compatibility issues.</p> <p>Requests the following issues be addressed in order of priority, to inform the master planning process:</p> <ul style="list-style-type: none"> a) Establish a precinct-wide strategy for resolving environmental compatibility issues – Informed by technical studies, this precinct-wide strategy will need to establish guidance that determines levels for the entire precinct in response to flooding/contamination constraints, identifies appropriate setbacks and development types in relation to pipelines and odour/noise sources from continuing industrial uses within the precinct, map ecological assets, etc., and not risk the resolution of these issues be left to the behest of site-by-site development proposals. b) Establish a transport and structural framework – This requires advanced resolution of the structure and staging of the internal street network, alongside a commitment to transport infrastructure (PLR Stage 1 and 2), to service the future population. c) Establish parameters for the public domain – This will require preparing a Public Domain Strategy for the precinct, noting that the scope, staging and delivery of the active town centre core and associated public domain areas remain undefined. d) Establish principles for built form and density – The above elements must provide the context and certainty, before determining the 	<p>Section 4.4 of this report for further details.</p> <p>Technical studies have already identified multiple measures to address potential constraints arising from flooding, hazards, odour, etc. These will be further developed through the next stage of the process through a precinct led rezoning and supporting infrastructure framework. This will include detailed master planning, flood study and transport studies and any other studies to inform the preparation of development controls for the precinct.</p> <p>The place strategy (at action 4.2) identifies that a Public Domain Strategy for the precinct is required as part of a future rezoning. Refer Section 4.3.3 of this report for further detail.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		appropriate design response to guide future development.	
City of Parramatta	Planning Controls –Development Controls	<p>Considers that the proposed development standards are premature and may result in poor built form and amenity. In their current form, the indicative development standards are not supported due to:</p> <ul style="list-style-type: none"> a) Further consideration needed to be given to the role and hierarchy of the Camellia Town Centre and the suitability of the indicative building heights and floor space ratios. The proposed height and floor space ratios are comparable to planning provisions within CBDs and will result in excessive densities within the town centre. This is not appropriate given Camellia’s location on the fringe of the Parramatta CBD. b) It is unclear how the building heights and density/floor space controls were formulated, and whether they respond positively to the site context. This includes complex level changes associated with remediation and flood mitigation and the implications for the density that can be accommodated in the Town Centre. c) The development standards are unlikely to deliver a quality urban environment. The built form outcomes in Figure 14 do not appear to comply with the Apartment Design Guide / reflect clear organisational principles or rational structural hierarchy to the streetscape. d) The draft Strategy and master plan have not contemplated the location and land take required to 	The height and floor space ratio controls have been informed by the technical studies and urban design analysis to ensure delivery of high quality place outcomes. These will be further tested through the rezoning process, which will include detailed urban design analysis as well as a precinct-wide flood risk study and plan. Refer Section 4.4 of this report for further detail on this issue.

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>accommodate decoupled parking and community facilities in the precinct. Requests that development standards and density assumptions contained in the draft Strategy are removed, specifically Figure 14 and Table 1. This would enable greater flexibility for future master planning to holistically respond to environmental matters, in particular, the constrained character of the precinct.</p>	
<p>City of Parramatta</p>	<p>Development – Overall Density/Scale of Development</p>	<p>Requests that the key principle is amended as follows to ‘create a density of development that corresponds with the projected capacity of the transport network, social infrastructure, desired future character and [environmental constraints of the precinct]’.</p>	<p>Wording has been updated as recommended by Council.</p>
<p>City of Parramatta</p>	<p>Urban Design – Built Form</p>	<p>Requests that the plans included in the draft Strategy are amended to be diagrammatic only, focusing on establishing well-resolved structural elements for the precinct and reflecting the vision and principles within the document.</p>	<p>Diagrams have been updated to remove indicative-built form information with well resolved structural elements shown only.</p>
<p>City of Parramatta</p>	<p>Place Strategy – Principles</p>	<p>Requests that design principles for desired built form typologies be put in place to what appears to be prescriptive building heights and footprints. Design principles can include but should not be limited to the following:</p> <ul style="list-style-type: none"> a) Supporting taller buildings (where appropriate) of a slender and more elegant form b) Maximising potential amenity and environmental performance c) Allowing for street wall heights to proportionally respond to street widths 	<p>Integrated master plan now includes design principles.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		d) Mitigating the impact of buildings on the public domain and streetscape experience.	
City of Parramatta	Planning Controls –Development Controls	Recommends that the Department work with Council officers to complete relevant modelling to test and develop suitable development standards for the precinct.	The department will work with council through the rezoning process to test and refine controls as identified in Section 8 of the place strategy.
City of Parramatta	Urban Design – General	Requests there needs to be a consistent street edge to the foreshore land (not just along the northern periphery close to the town centre) to optimise public access and legibility of public spaces from private development.	<p>A consistent street edge has been provided along the foreshore with the exception of the 15 Grand Avenue, due to width of the site and constraints with the Parramatta. The local road network is indicative and will be confirmed as part of a future rezoning through detailed urban design analysis and transport studies.</p> <p>A new action (4.8) has also been included in place strategy to identify the need to establish arrangements for the remediation, dedication, embellishment, and long-term maintenance of the foreshore.</p>
City of Parramatta	Environment – Sustainability, Infrastructure – Utilities	Comments the water recycling facility in Camellia is broadly supported to enable the establishment and growth of circular economies in the precinct.	Noted.
City of Parramatta	Housing – Affordable Housing	Requests key principles be included to guide the location and provision of affordable housing (i.e., to be located within walking distance of amenities such as public transport, shops and employment areas) under Direction 4.	All residential dwellings have been designed to be within walking distance of the Camellia Town Centre and associated public transport.
City of Parramatta	Economy – Night –Time Economy,	Note under Direction 4 the provision of student housing near amenities could contribute to the night-time economy,	The place strategy has been updated to reference the

Submitter	Issue	Summarised Submission Comment	Department Response
	Housing – Diversity	establishment of innovation spaces and future partnerships between industries and universities.	contribution of student housing to the night-time economy.
City of Parramatta	Housing – Affordable Housing	Considers mandatory provisions for affordable housing to be provided in perpetuity.	Affordable housing details to be worked through as part of the rezoning process. Refer Section 4.12 for further detail.
City of Parramatta	Housing – Affordable Housing	Enable a higher rate of provision that is higher than 5% where it is determined to be feasible (i.e., higher rate of provision for sites with a larger site area or where there are greater height and FSR incentives).	Agree, where feasible a higher rate of affordable housing should be provided. The planning controls now identify that " <i>Establish a requirement for the delivery of 5% to 10% affordable housing provision</i> ". This will be investigated further through the rezoning process. Refer Section 4.12 for further detail.
City of Parramatta	Housing – Diversity	Requests more detail on the desired housing typologies for the precinct.	<p>Place strategy has been updated to provide more detail on housing typologies:</p> <ul style="list-style-type: none"> • Amended strategic direction 4 principle "• Increase housing choice and affordability to support a growing GOP and Central River City" to add "by ensuring planning controls for the town centre enable the delivery of a range of housing typologies, including build-to-rent, student accommodation, co-living, private housing, and affordable housing." • Wording refined page 55 to identify housing

Submitter	Issue	Summarised Submission Comment	Department Response
			<p>typologies to be explored</p> <ul style="list-style-type: none"> • New planning control included to identify the need to “<i>Investigate and implement controls to enable the delivery of a diversity of dwelling typologies</i>” as part of the rezoning
<p>City of Parramatta</p>	<p>Amenity – Land Use Conflict</p>	<p>Identify proposed measures to ensure that existing industrial and racecourse uses will not adversely impact future residential areas.</p>	<p>The place strategy identifies potential measures, which have been informed by technical studies, required to be implemented to ensure residential amenity. Planning controls will be developed as part of the rezoning process to ensure residential amenity and additional wording has been included in Section 8 of the place strategy to identify this. Refer Section 4.8 of this report.</p>
<p>City of Parramatta</p>	<p>Amenity –Air and Odour</p>	<p>Notes a portion of land along the northern periphery (i.e., George Weston site) has been earmarked for residential development despite having been identified as an area subject to medium and high odour risk. Recommends the introduction of less sensitive land uses or staging of development be carefully considered to mitigate potential odour impacts.</p>	<p>The modelling results indicate a potential risk associated with the interface of the residential land (i.e., the former GWF site – assuming GWF have vacated the site) with the nearby industrial land use in this location. The identified risk in this location is not dissimilar to the predicted risk at the residential areas in Rydalmere across Parramatta river. The modelling is conservative as it assumes (in the future) all of the available industrial land is occupied by industry and is continuously emitting air emissions. However, the future land use / industry may not have any air emissions at all.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
			<p>The modelling therefore presents a "worst case scenario". To alleviate the potential risk associated in this location, the following can be considered as part of future planning controls and detailed design:</p> <ul style="list-style-type: none"> • Use the portion of the GWF land closest to the industrial land as recreational area to act as a buffer • Require that part of the GWF land closest to the industrial land to commercial uses with limited air emission to act as a buffer <p>Future industry nearby may also need to recognise the residential land and apply appropriate air mitigation and controls to minimise impacts.</p> <p>Careful consideration of staging of development and operating industries will be required. The place strategy also identifies the need to consult further with business owners and landowners to discuss how current odour and air emissions can be mitigated to meet the future requirements and minimise the potential for land-use conflict. (Action 4.3).</p>
City of Parramatta	Planning Controls -Land Use	Consider re-zoning land along the southeast periphery of Camellia (i.e., part of the VIVA Energy site) as urban services land as it would result in a more centralised heavy industry area for Camellia. Existing use rights would	Land south of Durham Street will be retained for heavy industry. This is in line with recent development approvals. It accounts for demand and the loss of heavy industrial land

Submitter	Issue	Summarised Submission Comment	Department Response
		enable the retention of important heavy industry uses but the revised land-use zone would enable urban services at the periphery in the longer term.	used for the Clyde Stabling and Maintenance Facility. It also satisfies the proposal for heavy industry along the Parramatta River to transition to urban services. Refer Section 4.4 of this report.
City of Parramatta	Amenity – Land Use Conflict	Recommends planning controls under Direction 4 should draw from the discussions and recommendations of the Qualitative Hazard Assessment Report, Noise and Vibration Implementation Report and Air and Odour Implementation Report. The draft Strategy has incorporated only some of the recommendations.	Wording in Section 8 of the place strategy refined to clarify that controls identified are a preliminary list, which may be expanded during investigations for a future rezoning.
City of Parramatta	Amenity – Air and Odour	Recommends Action 2 under Direction 4 to ‘investigate and consult with business and landowners regarding how current odour and air emissions can be mitigated’ – should occur prior to rezoning.	Consultation with interested stakeholders has been undertaken. Further consultation will be completed as part of the rezoning process.
City of Parramatta	Economy – Night-Time Economy	Amend principles under Direction 2 to include consideration of ‘facilitating opportunities to build the night-time economy within but not limited to the Town Centre and Entertainment sub-precincts’.	Additional principle under Strategic Direction 2 added in the place strategy: <i>‘Identify and facilitate opportunities to build the night-time economy within the Town Centre and Entertainment, and Urban Services sub-precincts.’</i>
City of Parramatta	Economy – Night-Time Economy	Amend planning controls under Direction 4 to identify indicative ‘late-night trading areas’ within the broader precinct.	Additional planning control included as proposed: <i>‘Identify late-night trading areas across the precinct.’</i>
City of Parramatta	Development – Staging, Economy – Night-Time Economy	Amend the staging plan to consider the establishment of night-time venues in the early stages of development; capitalising on the availability of land close to the Parramatta CBD and transport routes.	Staging plan amended to include the following under the employment column in the short term: <i>‘Progress development of the entertainment precinct,</i>

Submitter	Issue	Summarised Submission Comment	Department Response
			<i>capitalising on existing entertainment facilities and connections to the Parramatta CBD</i> . Refer Section 4.4 of this report.
City of Parramatta	Place Strategy – Principles, Social Infrastructure – Public Spaces	Amend the principle under Direction 4 to ‘create a comfortable, [safe] and friendly public domain and street network that encourages and supports walking, cycling and the use of public transport [in the day and night]’.	Principle under Direction 4 amended as proposed: ‘ <i>Create a comfortable, safe and friendly public domain and street network that encourages and supports walking, cycling and the use of public transport in the day and night</i> ’.
City of Parramatta	Social Infrastructure – Public Spaces	Requests including an action under Direction 4 to ‘ensure the future Public Domain Strategy addresses design requirements (e.g., lighting and signage) for safe pedestrian and cycle routes/connections to and from the Town Centre and Entertainment sub-precincts from all directions’.	<p>A new action has been included in the place strategy (Action 4.2) ‘<i>Prepare a Public Domain Strategy for the precinct. Specific elements for inclusion in the Strategy are:</i></p> <ul style="list-style-type: none"> • <i>Design requirements (such as lighting and signage) for safe pedestrian and cycle routes/connections to and from the Town Centre and Entertainment sub-precincts in all directions</i>’ <p>Council is identified as the lead agency with the Department of Planning and Environment, and Transport for NSW as supporting agencies. Refer Section 4.3.3 and 5.2 of this report for further detail.</p>
City of Parramatta	Planning controls –Development Controls	Recommends including additional planning controls under Direction 4 to identify ‘safe routes’ to and from the Town Centre and Entertainment sub-precincts from all directions. This will ensure safety at night and promote a vibrant night-time economy.	Additional planning control included as proposed: ‘ <i>Identify ‘safe routes’ to and from the Town Centre and Entertainment sub-precincts from all directions, to ensure safety at night and promotion of a thriving night-time economy</i> ’.

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Place Strategy – Principles, Urban Design – Built Form	Amend the planning control under Direction 4 to provide ‘built form controls that promote framing of open space and public space to promote activation and passive surveillance [including active transport links within the industrial and urban services area]’.	Planning controls amended under Direction 4 amended as per bolded text: <i>‘Establish built form controls that promote framing of open space and public space to promote activation and passive surveillance, including for active transport links within the Industrial and Urban Services sub-precincts’.</i>
City of Parramatta	Urban Design – General	Amend the draft Strategy to include design principles/place outcomes for the Entertainment precinct. This can include placemaking initiatives that consider the experience of the precinct at night. Installations and public art projects could renew and reinforce the precinct’s unique character and the night-time economy.	Planning controls amended under Direction 4 to include the following: <i>‘Further develop design principles and controls for sub precincts and specific land uses.’</i>
City of Parramatta	Environment – Remediation, Place Strategy Process – Governance	Notes Council does not accept the responsibility of overseeing the precinct contamination management protocols. Notes Council has no legal powers or financial resources under the <i>Contaminated Land Management Act</i> to manage remediation of contaminated land on such a scale. Recommends that an overarching State body or authority with legislative powers should be assigned or created to govern the contamination protocols across the precinct.	Noted. Further discussions will be held with Council and the Environmental Protection Authority and responsible authorities will be confirmed as part of rezoning process.
City of Parramatta	Environment – Remediation, Infrastructure – Funding and Delivery	Considers that the cost estimates identified in the remediation implementation report are likely to be underestimated. Requests the report clarify if it includes the following: <ul style="list-style-type: none"> • Costings for ongoing management of a Long-Term Environmental Plan 	These costs have generally been included to various degrees however allowances for follow-up inspections or actions to rectify issues were not included. Please note the remediation costs are strategic level estimates and further assessment of costs will be

Submitter	Issue	Summarised Submission Comment	Department Response
		<ul style="list-style-type: none"> • Contingency to address uncertainty around the nature and volume of contaminated fill, groundwater and residual contamination • Biannual/quarterly inspections of any surface capping layer/subsurface impermeable geomembrane filter • Reporting of the inspection monitoring results • Follow up inspections • Soil validation and analysis • Imported source material reviews • Scientist / Engineer rates • Rectification work • Repair and/or replacement of adopted remediation technologies • Cost of remediation technology feasibility and or pilot studies. 	<p>undertaken. Refer to Appendix C of the remediation implementation report for further detail.</p>
<p>City of Parramatta</p>	<p>Environment – Remediation</p>	<p>Notes the remediation implementation report advocates the use of impermeable geomembranes and engineered impermeable barrier walls. Recommends remediation implementation report review the durability of these technologies, their capacity to remain functional, without requiring excessive maintenance/repair, and provide details on their design lifetime.</p>	<p>The remediation implementation report (Section 5.2) has been updated to include some discussion on typical and achievable design lives for a range of capping systems.</p>
<p>City of Parramatta</p>	<p>Environment – Remediation</p>	<p>While Council is open to facilitating ongoing discussions with VIVA Energy regarding potential public access to the wetlands, it is required to consider the following:</p> <ul style="list-style-type: none"> • Consult Environmental Protection Authority with a view to assessing which agency is appropriate for overseeing the wetlands • Include the wetlands in the scope of future contamination protocols 	<p>Wetlands is now addressed in the remediation implementation report.</p> <p>Consultation has been undertaken with the Environmental Protection Authority. They have advised they do not manage land so would not be appropriate for oversee the wetlands in a land management sense. However,</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		<ul style="list-style-type: none"> Consider the wetlands adjacent to Parramatta River may fall under the responsibility of Maritime NSW. 	<p>they do regulate matters under the Protection of the Environment Operations Act as well as some contaminated sites under the Contaminated Land Management Act. The wetland is part of Viva's Environment Protection Licence (EPL). This means that wetlands area is currently regulated by the Environmental Protection Authority. However, if Viva did seek to remove the wetlands from the licensed premises (or to surrender the EPL) at some point in future, ongoing regulatory arrangements would need to be reviewed.</p> <p>This matter will be further investigated as part of future rezoning process.</p>
City of Parramatta	Environment – Remediation	Object to any allocation of any residual contamination liabilities for the precinct to Council is outright objected to. The principle under Direction 5 notes 'residual contamination liabilities should be appropriately identified, apportioned, funded and governed' is acknowledged. Note that unreasonable apportionment of responsibility to Council in this regard would not be supported.	Noted.
City of Parramatta	Environment – Remediation	Amend the remediation implementation report to address the warranty, durability, and lifetime of the capping layer	The remediation implementation report has been updated to include some discussion on typical and achievable design lives for a range of capping systems.
City of Parramatta	Environment – Remediation	Recommends Action 6 to 'explore opportunities for the development of a funding framework' should entail Council involvement and input into the framework.	Council is identified as a key stakeholder (Action 5.6) to explore a funding strategy to in collaboration with Department,

Submitter	Issue	Summarised Submission Comment	Department Response
			and the Environmental Protection Authority.
City of Parramatta	Environment – Remediation, Place Strategy Process – Governance	Notes Action 2 to ‘investigate governance mechanisms for precinct wide remediation and/or contamination management activities’, recommends this entail Council input and feedback.	Council is identified as a key stakeholder (now action 5.6) in collaboration with Department, and the Environmental Protection Authority.
City of Parramatta	Environment – Remediation, Place Strategy Process – Governance	Notes Action 4 to ‘work and consult with landowners to stage remediation appropriately’, recommends this entail Council involvement and input into a staging framework for the precinct prior to rezoning and at the development applications stage. Recommends appropriately considering the role of any future governance body to work with landowners and coordinate the staging of development to avoid land–use conflicts during remediation	Council is identified as a key stakeholder (action 5.4) in collaboration with Department, and the Environmental Protection Authority.
City of Parramatta	Environment – Remediation	Requests planning controls under Direction 5 include ‘establishing a staging and sequencing framework to guide remediation and/or management activities to avoid land–use conflicts’. Notes the remediation implementation report should expand on the experience of the Homebush Bay and Rhodes peninsula redevelopment, to inform the formulation of the staging framework for Camellia.	Planning controls amended under Direction 5 as recommended. Section 9 of the remediation implementation report amended to expand on experience of the Homebush Bay and Rhodes peninsula redevelopment, to inform the formulation of the staging framework for Camellia.
City of Parramatta	Place Strategy Process – Implementation	Recommends Action 9 under Direction 1, ‘facilitating ongoing discussion between Viva Energy and City of Parramatta to explore the possibility of opening the Viva wetlands for public access.’, be amended to include the involvement of the Environment Protection Authority acknowledging that there are existing notices on the	Action (1.9 in final place strategy) has been amended to include Environment Protection Authority as recommended.

Submitter	Issue	Summarised Submission Comment	Department Response
		land, and the issue may fall within the purview of Maritime NSW.	
City of Parramatta	Environment – Remediation, Infrastructure – Funding and Delivery	Amend the remediation implementation report and infrastructure delivery plan to address contamination extents and costs associated with remediation and management of the wetlands.	Remediation implementation report and infrastructure delivery plan have been amended. to address contamination extents and costs associated with remediation and management of the wetlands.
City of Parramatta	Environment – Remediation	Amend the remediation implementation report to include discussion on past precedent in relation to the use of various funding mechanisms (e.g., the experience of Homebush Bay/Rhodes peninsula redevelopment). Notes this can inform Action 6 under Direction 5 to explore opportunities to develop a funding framework for remediation works.	Funding approaches for contamination will be investigated further investigated as part of the rezoning process as per Action 5.6.
City of Parramatta	Environment – Remediation, Infrastructure – Funding and Delivery	Consider funding mechanisms whereby future developments could fund ongoing maintenance costs, assuming medium-high density developments where ongoing costs associated with foreshore land could potentially be funded as part of strata title arrangements.	There are several precedents where strata body land includes public access. This will be investigated further investigated as part of the rezoning process and developing precinct-wide documentation to implement the remediation strategy to support the planning process (action 5.1) and establish arrangements for the foreshore (action 4.8).
City of Parramatta	Environment – Remediation, Planning Controls –Development controls	Recommends planning controls will need to consider easements to accommodate and allow servicing of groundwater remediation technologies along the foreshore area if these technologies are to be pursued.	Section 9.1 of the remediation implementation report identifies the need for future planning controls: <i>‘Future planning should also give consideration to the creation of easements within these setbacks for the future</i>

Submitter	Issue	Summarised Submission Comment	Department Response
			<p><i>installation and maintenance of a permeable reactive barrier or other groundwater remediation technologies along the foreshore. The location and size of the required easements would be determined as part of the remediation design process’.</i></p> <p>Panning control under strategic direction 5 amended in blue text as follows: <i>‘Make provision for the installation of remediation technologies and maintenance arrangements, where required, such as the creation of easements and setback controls’</i></p>
City of Parramatta	Environment – IWCMS (including Flooding)	Recommends clear analysis of flood risks is required and must be addressed in the final place strategy.	The place strategy has been amended to provide a clearer analysis of flood risks. Refer to updated text on page 33 which now describes flood risk for the precinct, page 37 includes description of what the map shows and provides definitions of terms, and page 67 to identify further flooding analysis is required to implement the master plan.
City of Parramatta	Environment – IWCMS (including Flooding)	If the proposed location of the Town Centre is maintained, it is recommended to use fill to create a landform above the PMF flood level within the Town Centre area, noting that critical or sensitive land uses (i.e., the primary school, childcare facilities, clinics, electric substations, telecommunications) will need to be located on this landform. This would effectively create an area that will remain flood-free under all circumstances and continue to provide essential community services. It would also serve as a location for people within	The place strategy and Section 6.1 of the integrated water cycle management implementation plan has been updated to include this as a recommended planning condition. This will be investigated as part of the Flood Risk Study and Plan.

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>Camellia to use as a temporary refuge. Recommends DPE include this as part of planning controls under Direction 5 and ensure that it is within the scope of the precinct wide Flood Risk Study and Plan including the detailed flood model.</p>	
<p>City of Parramatta</p>	<p>Environment – IWCMS (including Flooding)</p>	<p>Recommends, in relation to Action 1 ‘to prepare a precinct-wide flood risk study and plan’, detailed flood modelling will also need to determine the impacts of proposed filling and creation of this platform and include mitigation solutions to compensate for on-site and off-site impacts for all events up to and including the PMF. Notes this technical work should be completed prior to the finalisation of the Strategy as part of a precinct-wide environmental management strategy.</p>	<p>Amended Action 1 (now 5.14 in final place strategy) to now read:</p> <p><i>‘identification of potential on- and off-site impacts from filling and capping, and mitigation of these impacts for all events up to PMF’.</i> This will be investigated further as part of the precinct-wide flood risk study and plan to support the rezoning.</p> <p>Refer Section 4.6 of this report for response on timing of additional technical studies.</p>
<p>City of Parramatta</p>	<p>Environment – IWCMS (including Flooding), Environment – Remediation</p>	<p>Consider that the creation of this landform (platform) presents the advantage that contaminated/remediated soil from elsewhere in the precinct could be used, which could potentially reduce off-site disposal costs. Notes it may also provide a raised viewing point for the entire precinct along the Parramatta River.</p>	<p>The remediation implementation report discusses this topic at length (refer to Section 9 – Review options to accommodate surplus spoil (soil/fill) within the Precinct): “Filling / mounding could reduce flood storage and potentially result in flooding impacts. Containment sites would need to be selected with consideration to the Precinct-wide flood management strategy”. In summary there is no identified opportunity to accommodate additional contaminated soil in the town centre due to potential flooding constraints.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Environment – IWCMS (including Flooding)	Recommends including an action under Direction 5 to consult with NSW SES and other emergency services authorities to obtain their advice on this fill approach and access requirements during flood events.	Additional action included 5.18: <i>‘Consult with the NSW State Emergency Service and other emergency service authorities to obtain their advice on the fill approach and access requirements during flood events’.</i>
City of Parramatta	Environment – IWCMS (including Flooding), Planning Controls – Development Controls	<p>Note planning controls under Direction 5 include ‘establishing shelter in place strategies for new development where necessary’. These controls should implement key principles of shelter in place:</p> <ul style="list-style-type: none"> a) The building must be designed to be structurally stable during all possible flood events b) There are locations in the building that is above the PMF and provided with necessary amenities (i.e., power, lighting food, water) c) Future height strategy will need to account for this (i.e., every building will likely need to be at least two storeys in height to enable shelter in place above the PMF flood waters) d) The public domain including areas outside the building to be designed appropriately and have the capacity to house additional people who need shelter and are unable to reach an area above the PMF. 	Planning controls amended under Direction 4 to include the following: <i>‘Establish shelter-in-place strategies for new development where necessary to implement key principles’.</i>
City of Parramatta	Environment – IWCMS (including Flooding), Social Infrastructure – Public Spaces	Include an additional action under Direction 4 requiring the preparation of a public domain strategy that investigates design considerations for flood-resilient buildings, parks and landscapes.	A new action has been included in the place strategy (Action 4.2) <i>‘Prepare a Public Domain Strategy for the precinct. Specific elements for inclusion in the Strategy are: ‘Design considerations for flood-resilient buildings and open spaces’</i>

Submitter	Issue	Summarised Submission Comment	Department Response
			Refer Section 4.3.3 and 5.2 of this report for further detail.
City of Parramatta	Environment – IWCMS (including Flooding)	Recommends the precinct-wide flood risk study will need to assess the proposed land uses within the precinct and confirm that the proposal can achieve consistency with Ministerial Direction 4.3 and the Flood Development Manual 2005.	Noted. Consistency is required under the <i>Environmental planning and Assessment Act 1979</i> to be addressed as part of the rezoning process. Notwithstanding, the integrated water cycle management strategy implementation report gives consideration to this.
City of Parramatta	Environment – IWCMS (including Flooding)	<p>In relation to urban services and industrial areas, the following mitigation measures must be considered:</p> <ul style="list-style-type: none"> a) Where possible, provide a flood-free evacuation route to a flood-free area. b) Where it is not possible to provide a route to a flood-free area, every new building should be built using shelter in place principles. c) Consider if a landform above the PMF flood level can be built as an area of refuge (similar to that recommended for the Town Centre). 	The integrated water cycle management strategy implementation report includes a consideration of these mitigation measures.
City of Parramatta	Environment – IWCMS (including Flooding)	Amend the exhibited integrated water cycle management implementation report and planning controls to expand the discussion on this issue. Further assessment and implementation measures should be informed by the Weber and Ramilo (2022) methodology which covers the following: sustainable supply options, improved wastewater treatment, stormwater quality improvement and hydrologic management as overarching objectives.	The integrated water cycle management strategy implementation report and place strategy identifies that in developing planning controls that the following should be given consideration: “Undertake further assessment the Weber and Ramilo (2022) methodology which covers sustainable supply options, improved wastewater treatment, stormwater quality improvement and hydrologic management as overarching objectives”.

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Environment – IWCMS (including Flooding)	Consider the precedent of Fisherman's Bend, Melbourne to inform future planning controls relating to integrated water cycle management.	The proposed measures for Fisherman's Bend will be reviewed and considered in developing planning controls for the precinct as part of the rezoning process.
City of Parramatta	Environment – Sustainability	The precinct vision to implement a net-zero precinct by 2050 is broadly supported, but the Australian Climate Council recommendation for net-zero emissions by 2035 is preferable.	Place strategy has been updated to target net zero precinct by 2040. To achieve this goal, all buildings should be 'net zero ready' by 2035, meaning they have sufficient infrastructure and space allocation to shift away from fossil fuel energy by 2035. Refer Section 4.2.4 of this report and sustainability implementation report for further detail.
City of Parramatta	Environment – Sustainability, Planning Controls – Development Controls	Recommends the planning controls under Direction 5 include future-proofing all, electric building design, zero-emissions material selection, and street design that enables sufficient soil volume to optimise street canopy cover.	<p>The draft place strategy cover these matters</p> <ul style="list-style-type: none"> • planning control: Future-proof buildings including mandating dual plumbing in all new buildings to connect to recycled water, providing electric vehicle charging and battery charging, augmenting buildings for digital/smart infrastructure and zero waste. • street canopy cover controls identified to be further investigated • materials selection will fall within the sustainability provisions.
City of Parramatta	Environment – Sustainability, Infrastructure –	Include an action under Direction 5 to expand on the sustainability implementation report, discussion of the associated costs and feasibility of the	Sustainability measures on private sites will be funded by developers, sustainability measures on public sites will be

Submitter	Issue	Summarised Submission Comment	Department Response
	Funding and Delivery	implementation measures recommended to implement a net-zero carbon precinct. Notes the sustainability implementation report and infrastructure development plan do not provide any guidance on the costs associated with the recommended sustainability measures and infrastructure.	funded through contributions and costs will be determined through detailed design.
City of Parramatta	Environment – Sustainability	Recommended to correct the reference to City of Parramatta’s Environmental Sustainability Strategy which is currently referenced as Sustainability Strategy on pages 22 and 58 of the draft Strategy.	The references to Environmental Sustainability Strategy have been corrected.
City of Parramatta	Traffic and Transport – Metro	Requests amending the draft strategy and ensure the integrated transport study considers, at a minimum, the provision for the later addition of a Metro Station in Camellia to futureproof sustainable travel for Camellia–Rosehill.	Refer Section 4.1.6 of this report.
City of Parramatta	Traffic and Transport – PLR	Notes the proposed route option running along Grand Parade (Option B) is Council’s preferred alignment for the Parramatta Light Rail Stage 2 (PLR 2). The alternative route along the foreshore (Option 2C) raises the risk of precluding recreation and open space opportunities. Broadly, the route should generally follow an extended alignment along Grand Avenue to connect Camellia as part of PL2 for the proposed rezoning to be viable.	Noted. Feedback has been referred to Transport for NSW for their consideration. Refer Section 4.1.2 for further information
City of Parramatta	Traffic and Transport – General	Supports identified initiatives to improve transport connectivity to surrounding areas in particular Rydalmere.	Noted.
City of Parramatta	Traffic and Transport –	Amend Action 1 to reflect Council’s involvement and input into the integrated traffic and transport study to	Council has now been identified as organisation that will be involved in the preparation of

Submitter	Issue	Summarised Submission Comment	Department Response
	Integrated Transport Study	ensure predicted impacts are appropriately minimised and managed, noting this technical work should be completed prior to the finalisation of the Strategy.	the integrated transport study action 3.1 in the final place strategy. Refer Table 4: Actions to implement the place strategy.
City of Parramatta	Traffic and Transport – Integrated Transport Study	<p>Ensure the scope of the integrated traffic and transport study covers the following:</p> <ul style="list-style-type: none"> a) Issues that may arise from Carnarvon Street becoming a rat run for traffic from Parramatta Road b) Address issues of congestion on Grand Avenue c) Address feasibility and appropriateness of future proposals for decoupled parking d) Resolve the internal street network and interface with the broader network e) Determining appropriate street profiles/ road intersections acknowledging the role of street design in assisting with contamination and water management in the precinct f) Consider potential grade separation of the intersection at James Ruse Drive (JRD), Hassall Street and Grand Avenue g) Further resolution of investigation areas located on Rosehill Racecourse and residual Metro West land to determine transportation needs and impacts on the precinct and broader network h) Determine appropriate parking allocation rates for all proposed uses within the precinct, as the employment of Parramatta CBD rates may not be suitable for the context of Camellia 	We are developing the scope for the integrated transport study and will consider Council recommendations as well as any other agency feedback. Further consultation will be undertaken with council on this matter. Refer Section 4.1.5 of this report.

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>i) Investigate the application of travel demand management (TMD), which applies a focused, data-led strategy that seeks to change network demand by redistributing journeys to other modes.</p>	
City of Parramatta	Traffic and Transport – Active Transport	<p>Amend the draft Strategy (Figures 9–10) and the exhibited transport implementation report to address active transport issues:</p> <p>a) Provide a network of cycleways and include staging details and addressing topography constraints.</p> <p>b) Include improved access to the existing path on eastern side of the JRD bridge over the river.</p> <p>c) Strategic bridges should be included to complete loops and avoid unnecessary dead ends as indicated close to Wentworth Street along Duck Creek/A 'Becketts Creek.</p> <p>d) Principles under Strategic Direction 3 should entail the early delivery of active transport connections.</p>	<p>a) To be addressed as part of more detailed master planning and staging. This is identified in the integrated master plan and transport implementation report.</p> <p>b) As per response to a above.</p> <p>c) Active transport linkage creating a dead end has now been removed from all figures.</p> <p>d) An additional principle has been included: <i>Deliver active transport links and public transport early to encourage sustainable travel choices.</i> Refer Section 4.1.6 of this report.</p>
City of Parramatta	Traffic and Transport – Active Transport	<p>Include an action under Strategic Direction 3 to investigate the establishment of a Travel Management Association (TMA) for Camellia.</p>	<p>This will be investigated as part of the integrated transport study.</p>
City of Parramatta	Traffic and Transport – Roads/Vehicular Infrastructure	<p>Amend the exhibited Integrated Master Plan document given that the proposed street profiles appear generic without consideration of how street design can assist with contamination and water management.</p>	<p>The street profiles are indicative and further consideration of contamination and water management as part of street design will be investigated as part of detailed master planning. The integrated master plan has been updated to note this.</p>
City of Parramatta	Traffic and Transport – PLR	<p>Amend Section 2.4.2.2 of the traffic and transport implementation report and Public Transport section of the draft</p>	<p>The 2 routes being investigated by Transport for NSW, both run through Camellia. The master</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		Strategy to emphasise that commitment of PLR Stage 2 will be critical to servicing proposed dwelling and job densities in Camellia.	<p>plan and place strategy have been updated to align. Refer Section 4.1.2 of this report.</p> <p>The traffic and transport implementation report has been amended to identify the importance of stage 2 to servicing proposed dwelling and job densities in Camellia.</p>
City of Parramatta	Traffic and Transport – Integrated Transport Study	Recommends future transport study to determine options to optimise accessibility to, from and within the Town Centre.	<p>We are developing the scope for the integrated transport study and will consider council recommendations as well as any other agency feedback. Outcomes from the next stage of transport planning will also align with the detailed master planning of the Town Centre. Further consultation will be undertaken with Council on this matter. Refer Section 4.1.5 of this report.</p>
City of Parramatta	Traffic and Transport – Integrated Transport Study	Recommends future transport study to determine a legible and accessible street network within the Town Centre.	See response above.
City of Parramatta	Traffic and Transport – Integrated Transport Study	Recommends future transport study to determine access options for future development located between JRD and PLR.	See response above.
City of Parramatta	Traffic and Transport – Integrated Transport Study	Recommends future transport study to optimise accessibility/ integration of the community hub with the light rail and sewage pumping station.	See response above.
City of Parramatta	Heritage	Notes the final place strategy reinforces the need to protect heritage items in the precinct.	Noted. The Vision, and wording in Strategic Direction 1 section has been changed to emphasise protection as follows: <i>'Camellia's rich heritage will be interpreted, celebrated</i>

Submitter	Issue	Summarised Submission Comment	Department Response
			<p><i>and promoted.'</i> to 'Camellia's rich heritage will be preserved, celebrated and promoted.'</p> <p>Heritage will continue to be protected through existing legislation. Strategic direction 1 outlines how heritage is to be protected and the place strategy highlights planning controls to be further investigated.</p>
City of Parramatta	Heritage	<p>Recommends further review is undertaken in relation to including a methodology that would allow protection of the potential archaeology in the precinct.</p>	<p>See our responses below.</p>
City of Parramatta	Heritage	<p>Recommended to include a methodology that would allow protection of the potential archaeology based on the recommendation of the PHALMS 2000. The Archaeological Management Units "AMU" of Parramatta Historical Archaeological Landscape Management Study "PHALMS" 2000 – show that Archaeological research potential is held in a part of the site and this will require procedures to be developed and adopted if recovery and salvage would occur. The methodology and management to be adopted for potential salvage would need to be addressed as part of the Camellia–Rosehill Strategy. In cases where deposits, relicts or sandstone material are discovered or recovered during the investigation, and redevelopment of the Camellia–Rosehill area, these findings could inform further stages of design/development and be integrated within the heritage interpretation of the precinct and sites</p>	<p>Except for the lot in which the grave of Elenor Magee and Child is located, which is rated high, all of the Camellia–Rosehill study area is rated in the PHALMS as having either moderate archaeological potential or none. Except along the existing rail corridor, the PHALMS recommends "monitoring, test-trenching or sampling" for all areas in the study area.</p> <p>Provision of a more detailed methodology is outside the scope of heritage implementation report. The PHALMS findings have however been reiterated in the heritage implementation report.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Heritage	<p>It would be likely that within the AMU (AMU 2692 to AMU 2698) which hold moderate or little archaeological research, that potential sandstone material could be salvaged and/or recovered (noting about 73 pallets of sandstone from the PLR project are currently stored in the Rosehill Station). A methodology for salvage and recovery should be prepared and integrated within the strategy along with a Heritage Archival Recording and Salvage Report. This should be consistent with the relevant NSW Heritage Office guidelines including How to Prepare Archival Recordings of Heritage Items (NSW Heritage Office 1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (NSW Heritage Office 2006). The Heritage Archival Recording and Salvage Report should provide the following:</p> <ul style="list-style-type: none"> • A historical background of the study areas • The results of documentary and database reviews of former heritage studies, and searches of statutory and non-statutory heritage registers • Results of a site inspection of the study areas • An assessment of the significance of the study areas • A photographic record of the study areas • A summary of heritage fabric salvaged from each study area or as part of the wider enabling works program • A catalogue sheet of the photographs with an aerial map of 	The heritage implementation report has been updated to include a recommendation that Heritage Archival Recording and Salvage Reports should be prepared where excavation is taking place within the precinct.

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>the location and direction of the photographs taken</p> <ul style="list-style-type: none"> An attached CD of all images. 	
City of Parramatta	Heritage	<p>Salvage materials such the sandstone blocks can be adopted or reused within the precinct, i.e., in public spaces and buffer zones, or eventually donated for another restoration project within our LGA. Recovered sandstone material that cannot be re-used within the precinct should be used within Parramatta LGA, and if suitable, it can be donated to Deerubbin LALC as the owner of the Parramatta Gaol complex for re-use and/or transferred on pallets for long-term storage to another significant precinct/project such as the Parramatta Gaol complex.</p>	<p>The heritage implementation report has been updated to include this as an opportunity.</p>
City of Parramatta	Heritage	<p>Notes there are 2 Aboriginal archaeological sites located within the precinct:</p> <ul style="list-style-type: none"> AHIMS 45-6-2559 is recorded in the Rosehill Gardens Racecourse carpark on the southern side of Grand Avenue North. AHIMS 45-6-3627 is recorded within the grounds of the former Parramatta Speedway, now being developed as the Clyde stabling and maintenance facility. <p>Consistent with the requirements under the terms of the <i>National Parks and Wildlife Act 1974</i> and to include the research into the archaeological record, it is recommended to undertake the following:</p> <ul style="list-style-type: none"> Aboriginal Consultation Test Excavation Aboriginal heritage induction to all employees, contractors and contractors engaged on the project 	<p>The Aboriginal Cultural Heritage Assessment recommendations have been refined to identify future management of these sites is to be consistent with the <i>National Parks and Wildlife Act 1974</i> (as amended).</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		<ul style="list-style-type: none"> Unexpected Finds and Human Remains Procedure. 	
City of Parramatta	Place Strategy Process – Implementation	Notes all technical work is completed, and outstanding issues are addressed before considering the finalisation of the draft place strategy. Recommends no Ministerial Direction should be issued until all matters are resolved.	<p>The place strategy is a strategic document that sets a planning framework for Camellia–Rosehill. The place strategy identifies that a precinct-wide approach to the rezoning is needed to ensure a coordinated approach across government to deliver good place outcomes and address the specific constraints that exist for future Camellia development. This includes undertaking the necessary supporting studies to support the rezoning.</p> <p>Refer Section 4.6 of this report for further detail.</p>
City of Parramatta	Place Strategy Process – Implementation	Ensure Council’s involvement and input into technical studies, future stages of detail master planning/modelling and preparation of any rezoning package.	As identified in the place strategy the department will continue to collaborate with Council in providing input into technical studies, future stages of detail master planning/modelling and preparation of any rezoning package.
City of Parramatta	Environment – Ecology	Recommends the mapping contained within the draft Strategy will need to further acknowledge flood and endangered wetlands beyond what is currently mapped is required – especially coastal wetlands at the confluence of Duck Creek and Parramatta River.	Ecology implementation report has been updated to identify protections under other environmental planning instruments and includes mapping to illustrate.
City of Parramatta	Environment – IWCMS (including Flooding)	Notes the draft Strategy will need to provide contextual information to the flood maps provided so that a general	Additional text has now been included. Refer to page 33 which now describes flood risk

Submitter	Issue	Summarised Submission Comment	Department Response
		interpretation of risks and how it affects land-use decisions can be communicated.	for the precinct, page 37 includes description of what the map shows and provides definitions of terms, and page 67 to identify further flooding analysis is required to implement the master plan.
City of Parramatta	Environment – Sustainability	<p>Recommends the submission be amended on page 10, Section 3.3 ensuring feasible and effective implementation of a net-zero precinct to read:</p> <p><i>“The precinct vision to implement a net-zero precinct by 2050 is broadly supported, but the Australian Climate Council recommendation for net-zero emissions by 2035 is preferable”.</i></p>	Place strategy has been updated to target net zero precinct by 2040. To achieve this goal, all buildings should be ‘net zero ready’ by 2035, meaning they have sufficient infrastructure and space allocation to shift away from fossil fuel energy by 2035. Refer Section 4.2.4 of this report and sustainability implementation report for further detail.

Table 14 Responses to additional comments provided by City of Parramatta post exhibition

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Social Infrastructure – Open space	Notes the increased open space provision in proximity to the high-density residential core and along the higher amenity river foreshore is supported. Comments as a number of the key open spaces have substantial interfaces with major roads that carry high volumes of heavy vehicles (James Ruse Dr / Grand Av) the design of these open spaces will be critical to ensuring high quality provision and amenity.	Noted. Future design matters will be investigated a part of detailed master planning and design processes.

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Social Infrastructure- Open space	<p>Recommends a local park (minimum 0.3ha consistent with best practice) should be provided within the urban services area in a central location adjoining the active transport corridor to ensure reasonable accessibility to recreational opportunities by future workers. Regarding the proposal to expand open space potentially within the Boral site, it would be good to gain an understanding of Boral's future operational plans as it seems unlikely that the closure of the batching plant would occur in the short to medium term. An understanding of the operational plans of existing businesses/industry would help inform options for site selection in relation to the open space servicing current and future workers.</p>	<p>A local park has been provided within the urban services precinct which comprises a portion of Boral site. The place strategy envisages that the Boral site and other existing industry will transition to higher order employment uses and this land will become available at that's time. Further consultation will be undertaken with Boral.</p>
City of Parramatta	Social Infrastructure - Local Parks	<p>Notes all proposed public open spaces should meet best-practice minimum sizes and widths to ensure adequate amenity and recreational functionality (Refer Draft Greener Places Design Guide and draft Urban Design Guide). Compliance of open spaces against minimum dimensions should be demonstrated. Local Parks 9 (0.1ha) and 10 (0.2ha) (as identified in Slide 7) are currently undersized to due being bisected by the proposed PLR corridor. Requests they be designed to function as a consolidated open space that is connected to the adjoining linear foreshore park to maximise functionality and reinforce the north-south green spine between Parramatta and Duck Rivers. Linear parks (7 and 12) (as identified in Slide 7) are located along major transport corridors (road / PLR) and should have a minimum width of 15m to provide adequate amenity and accommodate reasonable 2 recreational</p>	<p>A detailed review of open space has occurred in consultation with the project team and other stakeholders. Changes have been made to improve access and increase provision of open space particularly for the town centre.</p> <p>All local and district parks meet Council's minimum size requirements as set out in the Community Infrastructure Strategy. The linear parks generally meet the 15m width requirement:</p> <p>Local Linear Park 7 (0.5ha), 0.3ha of this is greater than 15m wide, and 0.4ha is greater than 8m wide.</p> <p>Local Linear Park 11 (3.5ha) * achieves min 15m width.</p> <p>Local Park 14 (2.0ha) - only 1.3ha of this is greater than 15m wide,</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>functionality above that provided by an otherwise active transport corridor.</p>	<p>however all is greater than 8m wide.</p> <p>Refer Section 4.3 of this report and landscape implementation report for further detail.</p>
<p>City of Parramatta</p>	<p>Social Infrastructure– District Parks</p>	<p>Notes delivery of the southern district open spaces, particularly the sporting fields, is critical to achieving adequate open space and recreation provision within the Camellia peninsula.</p> <p>Recommends the master plan provide for improved certainty in securing this land for public open space purposes as this will provide the only outdoor sporting fields for the future forecast population of approximately 25,000 (with surrounding fields typically being at or above capacity). Access to these fields will be potentially important for the proposed school (particularly if access to the racecourse land is not able to be achieved). Given the location of the Rosehill services facility (as identified in recent EIS Stage 3 approval of Sydney Metro West) in between the two sporting fields, District Park 15 and 16 (identified in Slide 17) will need to be planned and designed for not in isolation, but rather should provide clear connections to each other and planned to maximise operational outcomes from both a maintenance and user perspective. The location of the two sporting fields will likely create demand for additional provision/duplication of some types of infrastructure (e.g., parking and maintenance buildings) for maintenance and renewal of this infrastructure</p> <p>Supportive of the restricted access open space within the racecourse to supplement the wider network and also likely be required for the proposed school to meet physical activity requirements not able to be accommodated onsite.</p>	<p>Council’s community infrastructure strategy identifies the need for 1-2 x new full-size fields within Camellia as outlined in the social infrastructure implementation report.</p> <p>One sporting field can be accommodated in the western portion of the southern district open space (park 12). The provision of a sporting field in the eastern area is challenging due to Sydney Metro’s operational requirements. The eastern portion is planned to accommodate two multipurpose courts and a play space instead.</p> <p>Indicative concept plans have been provided in the landscape implementation report. The design and exact size of land available will be worked through as part of the future rezoning and development processes and is subject to the review of Sydney Metro’s operational requirements.</p> <p>Refer Section 4.3.2 for further detail.</p>

Submitter	Issue	Summarised Submission Comment	Department Response
City of Parramatta	Social Infrastructure-Recreation Facilities	Utilising benchmarks from City of Parramatta's Community Infrastructure Strategy (Section 1 pg. 60-61), the 4,328m ² required for a forecast population of 24,429 people should include a minimum of 1,885m ² library space, 1,954m ² community and subsidised space, and 489m ² cultural space. Furthermore, during the site identification stage, the community hub should meet certain criteria in alignment with Council's Community Infrastructure Strategy's Principles for the delivery of community infrastructure (Section 1 pg. 63-65). In addition, for the Camellia-Rosehill Precinct, the proposed community hub should be delivered over no more than three floors starting from ground level, include street frontage and high visibility, achieve high solar access and natural ventilation, adjacent public open space, and not be located near any incompatible uses (e.g., pub, gambling venues.)	Comments are noted . Design considerations have been included in the social infrastructure implementation report. The place strategy identifies planning controls will be developed for specific development types such as a community facility. Council will be involved in (or may lead) the next stage of planning for this facility, including the various matters raised in the submission.
City of Parramatta	Social Infrastructure - Community Facilities	Supportive of the increased number of playgrounds, which will need to include two (2) larger district level facilities located within the district parks (northern and southern) to complement the proposed multi purpose courts (play precincts). Note that this will be subject to detailed design. There is limited capacity to provide indoor courts within the nearby Parramatta CBD. Requests the place strategy recognise the unique opportunity to provide indoor facilities within both the entertainment / town centre and urban services area through the inclusion of appropriate controls. It also provides an opportunity for additional recreational and other community facilities (e.g., indoor / outdoor courts) to be made available for community access and offset potential	Comments are noted. The opportunity to provide indoor facilities within both the entertainment / town centre and urban services area is identified in the open space provision plan included in the place strategy and supporting reports. Off leash dog areas are identified to be located within district parks > 2ha. Noting this is subject to detailed design.

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		<p>school use of public open space. Dog off-leash areas (minimum 1500m²) will also need to be provided in the larger open spaces (>1ha) to minimise conflicts with other users and provide adequate exercise opportunities. Note that this will be subject to detailed design.</p>	
<p>City of Parramatta</p>	<p>Social Infrastructure–schools</p>	<p>Council strongly advocates for robust evaluation and provision of sufficient site size and dimension for school infrastructure. Notes recent local school developments (e.g., Wentworth Point Public School) have demonstrated the negative outcomes that insufficient forecasting and site provision can deliver. Wentworth Point Public School was opened in January 2018, however within two years (in February 2020), five demountables were established on the student’s green play space, with another installed early in the following year. The demountables now severely limit children’s access to green open space. Recent conversations between Council and Principals of Parramatta Public School and Arthur Phillip High School also demonstrate the negative health, safety and operational impacts of insufficient open space on staff and students. These poor impacts are best avoided at the site identification and evaluation stage, and infrastructure should not be made to fit on an inadequate site.</p>	<p>Investigation sites for schools are considered to be sufficiently sized. Refer Section 4.3.1 of this report for further detail.. It is noted this matter will be further investigated with SINSW and Council as part of future rezoning and strategic business case processes.</p>
<p>City of Parramatta</p>	<p>Housing–diversity</p>	<p>Council seek clarification that this response should be “a higher rate than 5%” not “a higher rate of 5%”. Council is seeking a higher rate than 5%, preferably 10% in alignment with Councils Affordable Housing Policy 2019. As was raised in City Strategy’s comments on the Directions Paper and Draft place strategy, while the provision rate of affordable housing is identified as 5% to</p>	<p>Affordable housing controls (5-10%) will be investigated as part of developing planning controls during the rezoning process.</p> <p>A minimum of 5% affordable housing will be required and where viable a higher target will be investigated. We will undertake further assessment of</p>

Submitter	Issue	Summarised Submission Comment	Department Response
		<p>10% of total yield, this range presents the risk that future developments will only provide 5% as a minimum. It is recommended that future planning controls are drafted to enable Council to require more than 5% of affordable housing where it is determined to be feasible. It is also reiterated that future planning controls regarding affordable housing should also be mandated to be provided in perpetuity, rather than for a time-limited period (e.g., 10-15 years).</p>	<p>feasibility of affordable housing as part of the future rezoning and developing the infrastructure framework.</p> <p>Refer to Section 4.12 of this report for a response to this issue.</p>