



**Subject:** Webform submission from: Draft Camellia-Rosehill Place Strategy  
**Date:** Friday, 4 March 2022 6:01:07 PM  
**Attachments:** [doc21-851311-5-rpia-out-dpe---epa-response---draft-camellia-rosehill-place-strategy.pdf](#)

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Submitted on Fri, 04/03/2022 - 17:56

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

**Name**

**First name**

[Redacted]

**Last name**

[Redacted]

**I would like my submission to remain confidential**

No

**Info**

**Email**

[Redacted]

**Suburb/Town & Postcode**

Wollongong 2500

**Please provide your view on the project**

I am just providing comments

**Submission file**

[doc21-851311-5-rpia-out-dpe---epa-response---draft-camellia-rosehill-place-strategy.pdf](#)

**Submission**

Please find attached EPA comments on the Draft Strategy, if you have any questions please call me Regards [Redacted]

**I agree to the above statement**

Yes

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4 March 2022

Dear [REDACTED]

**Draft Camellia-Rosehill Place Strategy**

Thank you for the opportunity to provide comment on the Draft Camellia-Rosehill Place Strategy that is on public exhibition and forwarded to the Environment Protection Authority (EPA) for comment on the 17 December 2021.

The EPA has worked collaboratively with Department of Planning and Environment (DPE) on the development of the Strategy as part of the Project Control Group.

The EPA provides the attached comments (**Attachment A**) to help strengthen key actions and directions in the strategy to help support the vision for Camellia- Rosehill. These comments relate to:

- Contaminated Land Management
- Water Quality
- Managing Urban Hazards
- General Matters

The EPA would like to continue to work with Department of Planning and Environment in the further development of the strategy and its supporting actions and is able to meet at a mutually convenient time to discuss any of the enclosed comments if needed.

Should you require any further information, please contact Mr [REDACTED] on [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Att.

[REDACTED] TTY [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

## Attachment A

### Contaminated Land Management

- a) Page 29 sub-heading “Contamination” third sentence, suggest the following amendment that is in italics and underlined.

*There are multiples sites located in the precinct that are regulated under the Contaminated Land Management Act, 1997 (CLM Act) due to significant contamination, as well as many other sites that will require remediation or management to address contamination that exist onsite.*

Amendment is needed 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.

- b) Page 29 sub-heading “Contamination” second paragraph, suggest the following amendment that is in italics and underlined.

*Shallow groundwater is a common feature in many areas across the precinct and is contaminated due to legacy contamination.*

The term “in many cases” in the current narrative would benefit changing as it implies groundwater is a stable source located in individual places.

- c) Page 55 sub-heading “Precinct-wide remediation strategy” fifth paragraph, recommend moving this paragraph to after the dots points in this section and replace with the following amended words.

*The proposed remediation strategy is not intended to prohibit the adoption of new or alternative technologies that are not included above. If alternative technologies are proposed in future developments that differ from the proposed precinct-wide remediation strategy, applicants will need to demonstrate that the technology is viable on an individual site basis and consistent with the guiding principles of this strategy.*

- d) Page 55 sub-heading “Precinct-wide remediation strategy”, first sentence in paragraph after dot points, suggest the following amendment that is in italics and underlined.

Generally, individual landowners *and future site developers* will be responsible for remediation of their properties, including adjacent foreshore areas, as part of their redevelopment.

- e) Page 56 sub heading Precinct-wide remediation strategy, first sentence second paragraph, suggest following amendment that is in italics to and underlined

*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*

- f) Page 57 Precinct Wide Remediation Strategy Action 1 dot point 4 suggest following amendment that is in italics and underlined

- precinct-wide hydrogeological and groundwater quality *including but not limited to chromium, chlorinated hydrocarbons (for example DNAPL) and petroleum hydrocarbons (for example LNAPL)*

- g) Page 57 Precinct Wide Remediation Strategy Action 3 suggest following amendment that is in italics and underlined.

Review options *including treatment and reuse* to accommodate surplus spoil (soil/fill) within the precinct

- h) Page 57 Precinct Wide Remediation Strategy Action 3 suggest following amendment that is in *italics and underlined*

Work and consult with landowners *and developers* to stage remediation appropriately.

## Water Quality

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](#). In particular, 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](#)’.

Action 62 in the above District plan also recommends the need to “*improve the health of catchments and waterways through a risk-based approach to managing the cumulative impacts of development*”. To support this action, 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). This framework can be used to:

- ensure the community’s environmental values and uses for our waterways (being the [NSW Water Quality and River Flow Objectives](#)) are integrated into the planning and design of the area;
- identify relevant objectives for the waterway that support the community’s environmental values and uses, and can be used to set benchmarks for design and best practice;
- identify areas in the catchment where management responses cost-effectively reduce the impacts of land-use activities on our waterways; and
- support management of land use developments to achieve reasonable environmental performance levels that are sustainable, practical, and socially and economically viable.

## Managing Urban Hazards

The strategy recognises the delivery of high-quality place outcomes will require land-use conflict to be managed through appropriate buffer zones.

The design principle to avoid land-use conflicts and ensure amenity for residential and other sensitive land uses is supported, especially where residential uses are proposed in a mixed-use setting. The proposed town centre, for example, will be in the vicinity of a range of land uses that contain activities that have the potential to produce air and noise impacts. These uses include: the urban service transition precinct that contains activities such as the Parramatta Light Rail stabling yards, the existing Rydalmere industrial area and a new entertainment precinct (that includes the Rosehill Racecourse) which will be activated to become an 18-hour economy destination. The site will also be serviced by several major transport corridors.

Design features to minimise noise, air, vibration, hazard risk and visual impacts are required. The supporting planning and design controls would benefit strengthening to include the role of design excellence. Such 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. This will be further warranted especially where high-rise development is proposed in this mix of development.

The strategy also states that the State Heritage listed Sewage Pumping Station (SPS) 067 is expected to continue to operate in the immediate future. The implementation of buffers around the operational SPS067 will be an important requirement. Additional odour and noise mitigation measures should be investigated given the potential encroachment of sensitive residential receivers.

**General Matters**

The EPA recommends an amendment to 'key actions' under 'strategic directions' to clearly identify a key lead and partners (in separate columns).

While management of key issues can be shared there would be benefit in recognising a key lead for the delivery of actions outlined in the Strategy. 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. Such a model would improve the chance of success in the delivery of key tasks while also assisting in helping agencies and/or groups understand both commitment and resources needed in helping their delivery.