

26 June 2020



Mr Marcus Ray
Group Deputy Secretary
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

via online upload

Dear Mr Ray,

Submission to the Sydney Metro West EIS (SSI-10038)

The Urban Development Institute of Australia (UDIA) NSW is the peak body representing the interests of the urban development industry in New South Wales. We represent over 500 member companies that are directly involved in the industry including developers, strata and community managers, planners and lawyers.

UDIA NSW advocates for liveable, affordable, and connected cities, with that in mind we consider there is further work needed to properly assess the option of a station at Camellia.

Camellia was one of the five station options between Olympic Park and the Parramatta CBD considered in 2018. Subsequently the options narrowed between Camellia and Rydalmere. The EIS has now ruled out both Camellia and Rydalmere.

We note that the distance between Sydney Olympic Park and Parramatta is approximately 7 kilometres. This is the largest distance between the stations proposed and it is highly unusual for metro rail lines to have such long distances between stations. We believe it would be a significantly missed opportunity to deny the location of an additional metro station west of Sydney Olympic Park at Camellia.

UDIA considers a station between the Olympic Park and the Parramatta CBD is critical to creating the second CBD to provide further growth opportunities with jobs and housing in a mixed-use precinct of the Second CBD's inner-city.

The Rydalmere Station has since been ruled out, and it is critical for the future of the Parramatta CBD there are further investigations into Camellia. The EIS has not properly considered the potential of a station at Camellia based on the criteria in Table 3-8 (below).

Urban Development
Institute of Australia
NEW SOUTH WALES

PO Box Q402,
QVB Post Office NSW 1230
Level 5, 56 Clarence Street
Sydney NSW 2000
e udia@udiansw.com.au
t 02 9262 1214
w www.udiansw.com.au
abn 43 001 172 363

Table 3-8: Performance of station options between Parramatta and Sydney Olympic Park against the network objectives

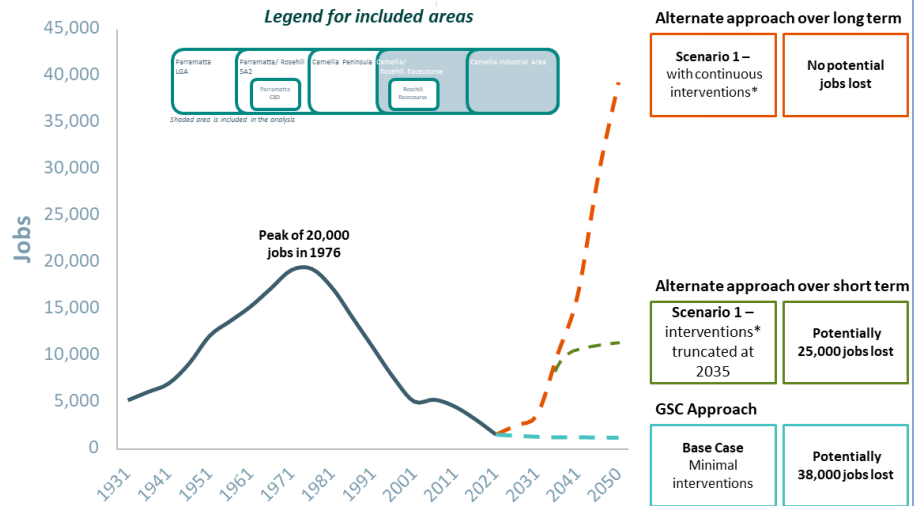
| Station location option | Evaluation criteria | | | | | | |
|-------------------------|---------------------|--|---------------------|----------------|-----------------------------|-----------------------|----------------------------------|
| | Customer benefits | Strategic land use and transport alignment | Productivity & jobs | Housing supply | Urban renewal & placemaking | Transport integration | Deliverability & value for money |
| Rydalmere | ● | ● | ● | ● | ● | ● | ● |
| Camelia | ● | ● | ● | ● | ● | ● | ● |
| Rosehill | ● | ● | ● | ● | ● | ● | ● |
| Silverwater East | ● | ● | ● | ● | ● | ● | ● |
| Silverwater West | ● | ● | ● | ● | ● | ● | ● |

UDIA NSW disputes the assessment of Camellia’s merits across various evaluation criteria. There is strong support from stakeholders and Council for a station at Camellia and we believe it has strategic alignment. Camellia has the potential to help catalyse Parramatta as a super-hub and decisions of this type of city-defining infrastructure cannot be done in isolation. In relation to the criteria we make the following comments:

| Criteria | UDIA Comment |
|--|--|
| Strategic Land Use and Planning | <p>UDIA sees clear strategic land use planning and transport alignment for a Sydney Metro West station at Camellia. The City of Parramatta’s executive leadership and elected councillors express a strong preference for a station at Camellia, and the Council’s Local Strategic Planning Statement, as endorsed by the Greater Sydney Commission, highlights the critical importance of Camellia Town Centre to Parramatta as a future centre which could provide 5,000 jobs and 10,000 dwellings.</p> <p>Camellia holds the long-term potential to strategically extend the footprint of the Parramatta CBD by rezoning employment lands as exhibited by DPIE in 2018 as a ‘Planned Precinct’. This would broaden Camellia’s economic base and facilitate the transition towards an integrated mixed-use employment and residential hub, including a high-density town centre focussed core of knowledge intensive jobs in commercial office floorspace and advanced manufacturing et.al. in other employment facilities across the peninsula.</p> |
| Productivity and Jobs | <p>Research by Value Advisory Partners – Sydney Employment Lands Study March 2020 commissioned by UDIA shows that by separating out Rosehill in the SA2 statistics, industrial employment in Camellia has fallen 92% from its peak in 1976, to only 1,600 jobs today. This is below the number of jobs that existed in the 1930s and employment in Camellia peaked in 1976.</p> <p>Camellia is a prime example of derelict and underutilised land in Greater Parramatta and provides a substantial opportunity for urban renewal. The peninsula is large enough to accommodate multiple</p> |

uses at over 350 hectares, with the Town Centre only requiring circa 35 hectares at the North Western gateway.

Mixed-use urban renewal at Camellia has the potential to support an additional 25-38,000 jobs.



Source: Value Advisory Partners historical analysis and forecasts of ABS data

* Using the Employment Lands Transformation Model to develop recommended interventions

Housing Supply

Council’s Local Strategic Planning Statement identifies the potential to support 3,500 dwellings, while noting dwelling capacity is subject to the State Government’s response to the GSC’s GPOP PIC.

Large consolidated precincts with station access have substantial potential for urban renewal and to deliver housing supply. There are examples in Hong Kong of metro catalysing development. Similar examples leveraging existing rail have occurred in Sydney, particularly the Rhodes Peninsula which has offered substantial rehabilitation and renewal opportunities.

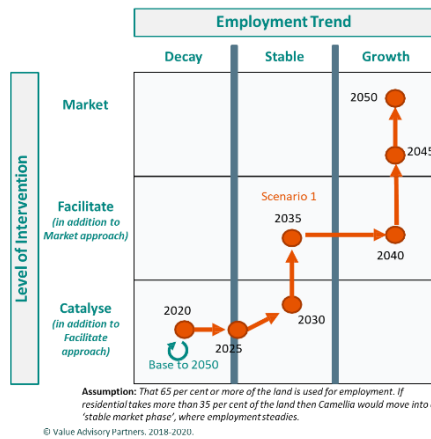
Urban Renewal and Place Making

Camellia holds the potential to strategically extend the Parramatta CBD by rezoning employment lands north and immediately east of the Rosehill Racecourse. This would broaden the Camellia peninsula’s economic base and facilitate the transition towards an integrated mixed-use employment and residential hub.

This is an intergenerational placemaking opportunity to renew derelict industrial land and create connections between the Parramatta CBD, Rosehill Racecourse, Western Sydney University, and the new high-density town centre at Camellia.

Without investment in rail and planning opportunities the peninsula will likely remain unutilised remnant industrial land. The Value Advisory Partners analysis identifies the urban renewal opportunity that can come from a catalysed urban renewal.

6.4 Actions to achieve employment outcomes – Camellia/ Rosehill ex racecourse and Camellia Industrial Precinct - Scenario 1 Commercial-in-confidence



To achieve market driven growth to 2050, the Camellia/ Rosehill area and Camellia Industrial Precinct would require interventions over time:

| Year | Recommended interventions | Outcome |
|------|--|--------------------------------------|
| 2020 | Ascertain investment to recalibrate to market requirement Planning changes to reduce constraints and place based enhancements Funding - Multi Source and Land Use Change | Repurpose land and drive development |
| 2025 | Ascertain investment to recalibrate to market requirement Planning changes to reduce constraints and place based enhancements Funding - Multi Source and Land Use Change | Repurpose land and drive development |
| 2030 | Monitor delivery and maintain market appeal Place based enhancements Funding - Multi Source | Continually driving development |
| 2035 | Monitor delivery and maintain market appeal Place based enhancements | Improving market attractiveness |
| 2040 | Review to ensure all stakeholder needs are met Strategic policy review for aligned objectives | Moderate market growth |
| 2045 | Review to ensure all stakeholder needs are met | Market driven growth |

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More broadly there is the potential to create a Parramatta super hub from Westmead to Camellia creating an integrated urban area that would be similar in size to the existing Sydney CBD. This would further enhance the potential for Parramatta to be a genuine CBD, as well as creating greater opportunities for the 30-minute city.

Parramatta is the Central River City – the second city in the Metropolis of Three cities Regional Plan for Sydney. A Metro rail station at Camellia can enhance the place making potential of greater access and engagement with the Parramatta River, including the potential for Ferry access.

Transport Integration

The Parramatta Light Rail will have a stop at Camellia, which provides an opportunity for interchange. There is also the possibility of all-hours ferry access to the peninsula. Light Rail, Ferry, Metro, and Buses creates the potential for four points of transport.

A station at Camellia would also improve the CBD commute for passengers that will connect with the light rail, removing the need to travel to the Parramatta CBD.

Deliverability and Value for Money

We understand the landowners on the Camellia Peninsula are prepared to support the funding for the variation to include a station at Camellia and that the additional track distance to move from the current alignment to the northern side of Rosehill Gardens is only minor.

Camellia retains the possibility of achieving significant urban renewal, aligning with strategic planning objectives and other transport infrastructure investment. It is difficult to understand why Camellia has been discounted from consideration as a Metro Station location. UDIA believes the significant future city potential generated through an expanded Parramatta CBD would be the optimal pathway forward. As remnant industrial land located on a peninsula, it is also a site which would have the limited community opposition to large scale urban renewal construction works.

UDIA NSW requests that Sydney Metro prepares an option for a Station at Camellia in light of the evidence, which appears to have been inappropriately discounted throughout the consideration of the precinct. As a precinct, that has the potential to form a part of Parramatta's extended CBD and the place making opportunity to enhance the access to the Parramatta River, it deserves much greater attention.

UDIA NSW is pleased to meet with you at your earliest convenience, please contact Mr Sam Stone, Manager, State Policy and Government Relations on 0401 213 899 or sstone@udiansw.com.au to arrange.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve Mann', with a stylized flourish at the end.

Steve Mann
Chief Executive

Attachments:

- A. Value Advisory Partners, Employment Lands Study, March 2020