

# #17

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 13, 2021 11:30:58 AM  
**Last Modified:** Friday, August 13, 2021 11:33:36 AM  
**Time Spent:** 00:02:38  
**IP Address:** 49.181.16.79

---

Page 1

## Q1

Contact information

Full Name	<b>Cameron Thomson</b>
Organisation	<b>Keylan Consulting</b>
Post Code	<b>2095</b>
Email Address	<b>cameron@keylan.com.au</b>

---

## Q2

Submissions may be made public (including full name, organisation name and postcode only). You can choose to publish your submission anonymously (using your postcode only). Please select from the options below:

**My submission can be made public (with my full name, organisation name and postcode published)**

---

## Q3

What has been your experience with the retain and manage industrial lands policy?

**Respondent skipped this question**

---

## Q4

What has been your experience with the review and manage industrial lands policy?

Refer to attachment.

---

## Q5

What suggestions would you make for industrial lands policy in the Greater Sydney Region Plan?

Refer to attachment.

---

## Q6

Are there any barriers to industrial lands fulfilling their functions?

**Respondent skipped this question**

---

**Q7**

Respondent skipped this question

From your perspective, what would be the most productive way to manage industrial lands? What are the opportunities to make industrial areas more productive?

---

**Q8**

Are there particular locations in Greater Sydney that are most appropriate to transition to alternative uses for industrial lands? Why?

Refer to attachment.

---

**Q9**

Respondent skipped this question

Are you aware of any new types of industrial or urban services uses occurring in industrial areas?

---

**Q10**

Respondent skipped this question

Please provide any further comments below

---

**Q11**

Would you like to attach a document?

**210813 KEYLAN Billbergia GSC Industrial Lands Submission.pdf (948.4KB)**

---



**Billbergia**  
*creating communities*<sup>®</sup>



**KEYLAN**  
consulting pty ltd

Suite 2, Level 1  
1 Rialto Lane  
Manly NSW 2095

13 August 2021

Greater Sydney Commission  
PO Box 257  
Parramatta, NSW 2124

Dear Sir/Madam,

## **SUBMISSION TO THE INDUSTRIAL LANDS POLICY REVIEW**

### **1 Introduction**

This submission has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *The Billbergia Group* (Billbergia) in response to the *Greater Sydney Commission's* (GSC) Industrial Lands Policy Review.

We note that the GSC is reviewing its **Retain and Manage** approach to industrial and urban services land as established under the *Greater Sydney Region Plan* (Region Plan). This submission is in response to Recommendation 7.5 of the NSW Productivity Commission's 2021 White Paper as detailed below:

*...Evaluate the retain-and-manage approach to managing industrial and urban services land in Greater Sydney against alternative approaches, to identify what would maximise net benefits to the State. Adopt the approach that maximises the State's welfare in the next update to the Greater Sydney Region Plan....*

This submission is made in the context of Billbergia's proposed major urban renewal project for the proposed Camellia Town Centre located at 1, 1C and 3-9 Grand Avenue, Camellia (the site).

Since 2015, the Billbergia Group has been working with the NSW State Government and the City of Parramatta Council (Council) on a new Camellia Town Centre as part of the urban renewal of the Camellia Precinct as identified in numerous Government strategic plans and policies.

In 2019, the Billbergia Group lodged a Planning Proposal which seeks height controls up to 65 storeys accommodating a new town centre, community facilities and approximately 4,850 new dwellings. The Billbergia Group is currently in discussions with the *Department of Planning, Industry and Environment* (DPIE) and Council on the proposal.

The GSC's approach to Camellia/Rosehill has long neglected the existing planning work and technical studies prepared for the precinct and oversimplified the site's constraints and merits as a mixed-use town centre.

As part of this review, we request the GSC consider the potential value of the site as a new town centre, noting immeasurable factors such as riverfront amenity & new high-capacity public transport which make Camellia/Rosehill a great place to live, work & play.

Further, this review should note the same employment outcomes can be achieved and increased on the site across a broader range of industries through commercial zones and enhancing the currently underutilised Rosehill Racecourse as an entertainment precinct

## 2 Greater Sydney Region Plan & Central City District Plan

The site and wider area are currently identified for the **Review and Manage** approach to planning for industrial and urban services land under the Region Plan and *Central City District Plan* (District Plan) (Figure 1).

Despite this, the Region Plan states that the retention of industrial activities will be a starting objective relation to Camellia. At a high level, we consider this is inconsistent with the broader review and manage approach which seeks to:

*“...review all industrial and urban services land under this approach to either confirm its retention (as described in the approach above) or manage uses to allow sites to transition to higher-order employment activities (such as business parks) and seek appropriate controls to maximise business and employment outcomes.”*

**The Region & District Plan do not provide a justification for applying the proposed ‘retention of industrial activities’ as the starting objective for Camellia compared to the broader approach being pursued for other ‘Review and Manage’ precincts.** In particular, the Review and Manage classification is entirely appropriate for this location to allow for innovation, fund remediation and facilitate the necessary land uses to facilitate urban renewal of contaminated sites.

As part of this review, the GSC should transparently and holistically apply the same review and manage approach across all these precincts.

Further, the GSC should reconsider the current blanket approach to Camellia noting that the intensity of existing employment varies from the east to west of Camellia.

Also note, the Region Plan identifies an urban renewal corridor from Camellia to Carlingford creating further ambiguity around the future vision for Camellia.

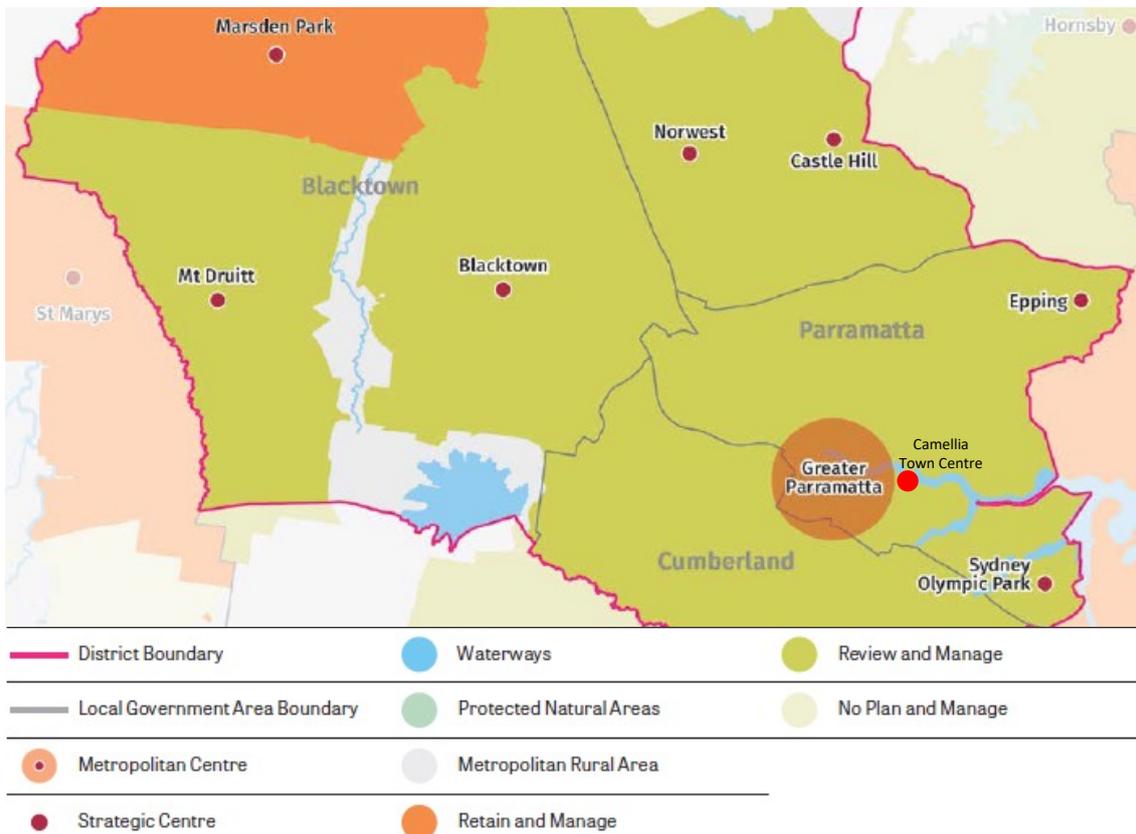


Figure 1: Central City District industrial and urban services land approaches (Source: District Plan)

### Recommendation

1. Create a single, consistent strategic direction for the site across the strategic framework (including DPIE & Council Documents) to ensure certainty for stakeholders.
2. Maintain and apply the same 'review and manage' approach across all identified precincts.
3. Reconsider the blanket approach to industrial lands in Camellia seen in the Region & District Plans, noting variations from east to west of the precinct.

### 3 GPOP: Place Based Infrastructure Compact

In November 2019, the GSC released the Draft *A City Supported by Infrastructure – Place-based Infrastructure Compact Pilot* (Draft GPOP PIC) for the Greater Parramatta Olympic Park (GPOP) area. The Draft GPOP PIC identifies 26 precincts, the site is included within Camellia-Rosehill.

The Draft GPOP PIC recommends that existing uses in Camellia/Rosehill be retained due to high upfront infrastructure costs, flooding and contamination constraints. Despite this, the Draft GPOP PIC continues to identify the site as *Next Generation Living* (Figure 2).

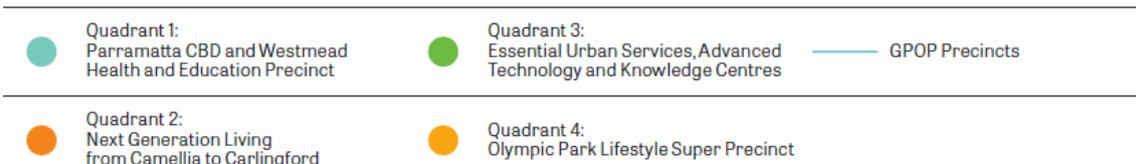


Figure 2: GPOP Precincts (Source: Draft GPOP PIC)

The Draft GPOP PIC identifies poor road access, contamination, wastewater pumping station requiring relocation and no existing school sites as the causes for high infrastructure costs.

However, the Draft GPOP PIC **does not** include reference to the previous planning undertaken for the site by DPIE, Council and industry which has demonstrated that site-specific strategies can be implemented to adequately manage constraints and funding.

Importantly, we further note that Council's recently adopted *City of Parramatta Outside CBD Contributions Plan* identifies funding for \$96 million of local infrastructure works in Camellia.

### 3.1 Previous & Ongoing Planning for Camellia Rosehill

There has been a significant number of planning and technical studies undertaken for the mixed-use redevelopment of Camellia since 2015 at significant expense to both the public and private sectors. These studies include:

- Draft Camellia Land Use and Infrastructure Strategy (DPIE 2015)
- Draft Camellia Town Centre Master Plan (DPIE 2018) – including Urban Design and Master Plan Report, Planning Report, Landfill Strategy, Transport and Traffic Assessment and Land Use Safety Study
- Planning Proposal Camellia Town Centre East (Billbergia 2017, 2019) – including Urban Design Report, Economic Analysis, Traffic and Transport Report, Heritage Issues Identification, Social Infrastructure Study, Infrastructure and Services Report, Flooding Impact Assessment, Flora and Fauna Survey and Assessment, Mangrove Assessment Report, Arborist Report, Remedial Costing and Geotechnical Advice.

In addition to the above, DPIE is currently preparing the draft Camellia-Rosehill Place Strategy which is anticipated to be placed on public exhibition in October 2021.

Accordingly, any amendments to the approach to industrial and employment lands in Camellia should align with this strategy to avoid further inconsistencies across the strategic framework.

#### Recommendation

4. Utilise the extensive studies and planning previously undertaken by DPIE, Council and the private sector to inform and align the approach to industrial and urban services land in Camellia.

## 4 The Case for the Camellia Town Centre

### 4.1 Employment

Billbergia's proposed mixed-use redevelopment of the site at Camellia includes an improved employment outcome through the provision of commercial and mixed use zones. The proposed redevelopment would facilitate a brand-new town centre to support the Parramatta CBD and create higher order and higher density employment on the site.

Billbergia's Planning Proposal as submitted in 2019 proposed 58,000m<sup>2</sup> commercial floorspace and 20,000m<sup>2</sup> retail floorspace facilitating over 1,000 new jobs on the site. Analysis undertaken by DPIE during the preparation of the Draft Camellia Town Centre Master Plan estimated the wider town centre will create up to 5,000 new jobs.

To diversify employment, there is also strong potential to redevelop the wider area as an entertainment precinct leveraging the existing Rosehill Racecourse for a wider variety of entertainment uses as previously proposed by the Australian Turf Club.

When considering the employment potential of the site, the declining number of jobs occurring under the existing planning framework must be acknowledged. Since 2012, Camellia has experienced significant land use change, heavily influenced by the downscaled operations at the Shell Refinery. Further, employment lands analysis commissioned by the GSC in 2018 has found Camellia Rosehill has the lowest jobs density of all employment precincts within the area as shown in Figure 3.



Figure 3: Greater Sydney Commission - Employment Lands Analysis (Source: SGS Economics & Planning)

As discussed above, there is a need to differentiate the west of Camellia from the east in strategic planning. East Camellia is well placed to be retained for industrial purposes given its sustained employment levels and contiguous footprint between much larger areas of industrial land at Rosehill, Silverwater and Rydalmere.

Further, the retention of industrial land in east Camellia and Rosehill provides sufficient area for industrial and urban services growth and to accommodate logistics facilities associated with Parramatta Light Rail and Sydney Metro West.

In contrast, the location of the subject site in western Camellia has experienced industrial decline and is contiguous with higher order, strategic uses at Western Sydney University (WSU) and Rosehill Racecourse. Introducing knowledge-intensive and entertainment uses on the site could have extensive economic and productivity benefits stemming from strategic colocation with WSU & Rosehill Racecourse. Ultimately, the proposed mixed-use development will provide more intensive, higher density, employment through retail and commercial development within Camellia Town Centre.

### Recommendation

5. Support the Billbergia Planning Proposal for the Camellia Town Centre to allow for higher order jobs growth on the site through leveraging the strong strategic location between WSU and Rosehill Racecourse

## 4.2 Infrastructure

Billbergia's proposed mixed use development within a new Town Centre is an excellent example of transit-oriented development through increasing both employment and homes surrounding the new light rail stop at Camellia.

It is envisaged any future development on the site will also incorporate reduced car parking to increase use of active and public transport whilst reducing demand for road infrastructure through its integration with the Parramatta Light Rail (PLR). Further, as part of the mixed use redevelopment of the site, Billbergia is committed to providing substantial public benefits on and surrounding the site. The proposed infrastructure to be delivered by Billbergia would service both the future occupants of the precinct and the surrounding district.

An offer to enter into a Voluntary Planning Agreement (VPA) was included in Billbergia's Planning Proposal submitted in 2019. Works included within the VPA offer include a new road, pedestrian & light rail bridge between Camellia & Rydalmere, road and intersection upgrades, affordable housing, new community centre/library, new town centre with public space and a new foreshore park along the Parramatta River. The significant works and contributions proposed by Billbergia through their most recent VPA offer should assist to alleviate the GSC's infrastructure concerns associated with Camellia.

## 4.3 Contamination and Remediation

We note the draft GPOP PIC raises contamination as a key risk and concern associated with the redevelopment of Camellia. Whilst there is contamination on site, there have also been investigations into redevelopment options which significantly reduce the risk and cost to the remediation of the site.

DPIE's 2018 Draft Camellia Town Centre Master Plan proposes a capping approach to address contamination which significantly reduces the extent of remediation works required and associated costs. Under this approach, the site would be capped and sealed, and no basement car parking provided. Instead, car parking will be provided above ground within the building's podium, with non-residential uses and residential uses sleeving the podium car parking, addressing the street.

Additionally, Billbergia has investigated remediating the site at its own expense as part of their 2019 Planning Proposal. Billbergia proposed approach sought to excavate and bury contaminated materials on site in underground concrete-walled and capped cells. Considering the above, we request the GSC to note that alternative approaches to resolving contamination on the site exist and are an opportunity associated with mixed use redevelopment rather than a constraint. The remediation of the site will provide significant public benefits through a foreshore reserve for the wider region and improved environmental standard of the site and the Parramatta River.

### Recommendation

6. Consider Camellia Town Centre's contamination as an opportunity rather than a constraint noting there are cost effective remediation approaches available through the support of the Billbergia Planning Proposal for the new Camellia Town Centre.

## 5 Conclusion

Billbergia's proposed mixed use redevelopment by creating a new Camellia Town Centre will provide immense economic, environmental and social benefits within a location with high strategic merit and potential for high levels of amenity.

The strategic framework for Camellia has been plagued by high levels of uncertainty in recent years with differing policy positions between Council, DPIE and the GSC.

The GSC's Industrial Lands Policy Review and DPIE's Camellia-Rosehill Place Strategy provide an opportunity to establish a single, consistent strategic direction in favour of the mixed use development of Camellia Town Centre.

Accordingly, we propose the following recommendations for the GSC's consideration in reviewing the approach to industrial lands:

### Recommendations

1. Create a single, consistent strategic direction for Camellia across the strategic framework (including DPIE & Council Documents) to ensure certainty for stakeholders.
2. Maintain and apply the same 'review and manage' approach across all identified precincts, including Camellia.
3. Reconsider the blanket approach to industrial lands in Camellia seen in the Region & District Plans, noting variations from east to west of the precinct.
4. Utilise the extensive studies and planning previously undertaken by DPIE, Council and the private sector to inform and align the approach to industrial and urban services land in Camellia.
5. Support the Billbergia Planning Proposal for the Camellia Town Centre to allow for higher order jobs growth on the site through leveraging the strong strategic location between WSU and Rosehill Racecourse
6. Consider Camellia Town Centre's contamination as an opportunity rather than a constraint noting there are cost effective remediation approaches available through the support of the Billbergia Planning Proposal for the new Camellia Town Centre.

Please do not hesitate to contact me on 02 8459 7506 or [michael@keylan.com.au](mailto:michael@keylan.com.au) if you wish to discuss any aspect of this submission.

Yours sincerely



Michael Woodland BTP  
Director