

23 October 2017

Director Transport Assessments  
Planning Services, Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001  
Attention Michael File, Director Urban Renewal

**RE: SUBMISSION TO ENVIRONMENTAL IMPACT STATEMENT –  
PARRAMATTA LIGHT RAIL STAGE 1 – CAMELLIA**

The GPT Group (GPT) is a listed property group. GPT is an active owner and manager of a \$11.1 billion diversified portfolio of high quality Australian retail, office and logistics property assets and a Funds Management platform with \$10.4 billion of property assets under management.

GPT has a keen interest in the regulatory and policy framework impacting its assets, including strategic, transport and statutory planning. GPT has long favoured a proactive and cooperative approach to working with all levels of Government to achieve the highest quality outcomes for all stakeholders. This is evidenced in GPT's delivery of highly successful, city-shaping projects in locations as diverse as Rouse Hill, Charlestown, Macarthur and Wollongong.

GPT is highly supportive of the investment that the NSW State Government is making in key infrastructure assets including Parramatta Light Rail (PLR) – Stage 1. Furthermore, GPT supports the integrated approach to transport and land use planning that is occurring and the co-ordinated approach that Transport for NSW (TfNSW) and Department of Planning and Environment (DPE) are now working to from stakeholder engagement through to project implementation.

This submission is on behalf of The GPT Group (GPT) who are the land owners at 11 Grand Avenue, Camellia and has been prepared with Colston Budd Rogers & Kafes Pty Ltd. This submission responds specifically to the Camellia component of the Environmental Impact Statement (EIS) and our concerns with the:

- Assessment criteria for the route alignment through Camellia Town Centre
- The recommendation of the EIS to adopt Option 2 – Sandown Freight Line as the preferred route through Camellia
- Location of the stabling and maintenance facility in the context of the Stage route announcement

Our submission is set down through the following sections:

- Site location and road network
- Previous planning for Camellia
- Light rail EIS
- Existing site
- Potential development
- Traffic generation and potential road works
- Summary

### Site Location and Road Network

The site is bound by Grand Avenue to the south, Parramatta River to the north and a mix of industrial and commercial/mixed uses in Camellia and Rosehill. Rosehill Racecourse is south of the site. The site is separated into two parts, one north of the Sandown Line and one to the south. It is occupied by industrial uses and has a frontage of some 350 metres to Grand Avenue. The location of the site is shown in Figure 1.

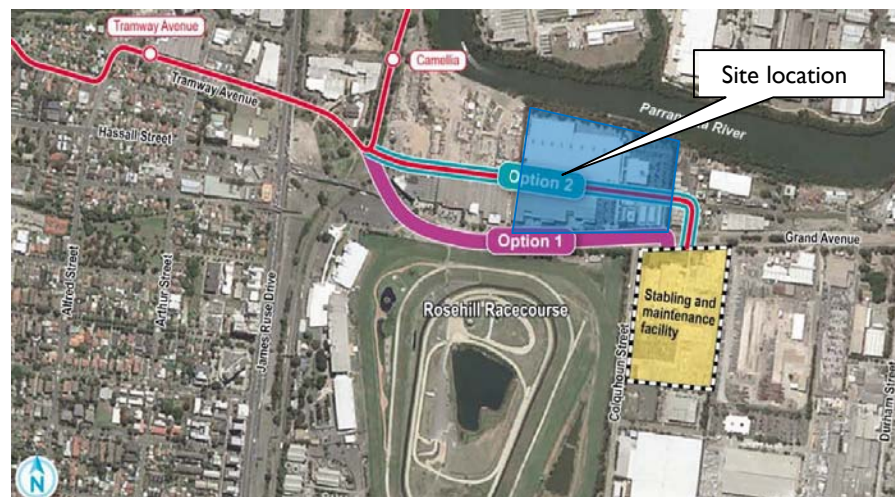


Figure 1 Site location and light rail alignment options  
(Source: Figure 3.9, Section 3.4.2.3, Page 3-28, Parramatta Light Rail EIS, dated 22/8/17)

Grand Avenue is an east-west road on the southern boundary of the site. It provides separate carriageways separated by a median with generally one traffic lane and one parking lane in each direction. There are several median 'cut through' locations to facilitate access to intersecting streets and a number of sites. The majority of vehicles access the area to/from the west via James Ruse Drive.

Existing access to the site is via four driveways which each provide for left-in/left-out movements. The southern lot is accessed via the three western driveways and the northern lot uses the eastern access.

## Previous Planning for Camellia

There has been previous planning for the renewal of Camellia. The Department of Planning and Environment and City of Parramatta Council proposes to:

*transform Camellia into a residential and mixed use precinct (the Camellia Town Centre), while maintaining some areas of existing industrial usage. This is proposed to be achieved through rezoning and improving connectivity to the region. Camellia will also continue to house important industrial land" (EIS, Section 3.4.2.3).*

Section 14.2.1 of the EIS further discusses the Camellia town centre and states that it is:

*planned to be a 21st century living and business district comprising industry research, education, employment, retail, recreation, entertainment and residential uses with transport at its heart. The light rail is an integral component of the Camellia Town Centre vision and its growth as a vibrant mixed-use area. Ongoing consultation between NSW Government agencies aims to coordinate light rail and town centre design. The urban design strategy for Rosehill and Camellia precinct is to:*

- *Reinforce activity in the new Camellia Town Centre*
- *Support accessible transport interchanges to future expansions of the light rail*
- *Leverage place making opportunities;*
- *Create a pedestrian friendly light rail corridor; and*
- *Integrate active transport while future proofing the area as it evolves from industrial into a mixed-use town centre*

A draft Land Use and Infrastructure Strategy was developed for the Camellia town centre. The land use and transport intent is shown in Figure 2 (on the following page).

The draft strategy identifies the subject site as forming part of a new Camellia town centre. The town centre would include mixed retail, commercial and residential uses. Grand Avenue is intended as being the primary activity corridor providing for all transport modes including facilitating a future public transport corridor for light rail to link the precinct with Parramatta CBD and Sydney Olympic Park.



Figure 2 Camellia Precinct – Land use and transport  
Source: Camellia Precinct, Land Use and Infrastructure Strategy, Vol. 1, July 2015.

In association with the Land Use and Infrastructure Strategy for Camellia, a transport assessment was undertaken<sup>1</sup>. The transport assessment identifies a series of potential road and transport measures to accommodate the redevelopment of Camellia. These measures include:

- New light rail track and at least two stops on Grand Avenue
- New light rail bridge over Duck River with addition of traffic lanes
- Bus stops and shelters on dedicated routes
- Dedicated shared paths over Duck River and to link with UWS Rydalmere;
- Cycle facilities in town centre and at light rail stops; and
- Separated cycle route alongside light rail.

The report notes that the measures would be staged as required to accommodate development as it occurs over time.

<sup>1</sup> Camellia Precinct – Land Use and Infrastructure Analysis, Strategic Transport Assessment, Parsons Brinckerhoff, 15 July 2015

## Light Rail EIS

The EIS for PLR Stage 1 (Volume 1A<sup>2</sup> and Volume 1B<sup>3</sup>) is on public exhibition until 23 October 2017.

Stage 1 of Parramatta Light Rail will link Westmead with Parramatta CBD then east through the western corner of Camellia, and up through Telopea to Carlingford. This alignment is west of the subject site.

The state government has purchased a site on the southern side of Grand Avenue for a light rail stabling yard and maintenance facility. Construction of this facility is planned to commence in 2018.

A spur line would connect the main light rail line to the stabling yard and maintenance facility south-east of the site. There are two options for the spur line considered in the EIS.

**Option 1**, adjacent to Grand Avenue, would provide for better integration of the new Camellia town centre. It would also provide significantly improved opportunities for access to and through the town centre, including for pedestrians, cyclists and vehicles.

**Option 2**, north of Grand Avenue, would run through the middle of a number of sites, including the subject site. This would introduce restrictions on access for these sites, including the new Camellia town centre.

The EIS identifies that both Option 1 and Option 2 are strongly aligned with:

- Alignment with government priorities
- City building outcomes

These assessment criteria were developed when PLR - Stage 2 was proposed to run East through Camellia and onto Sydney Olympic Park (SOP). The preferred route for Stage 2 has now been announced with a likely route North of Parramatta River running East through Rydalmere, Ermington and Melrose Park.

A spur line that does not provide an active service to the future residents and current and future workers does not appear to be aligned with:

- Alignment with government priorities
- City building outcomes

The proposed PLR – Stage 2 alignment would not readily serve the future Camellia town centre. An alignment that travels along Grand Avenue to connect

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<sup>2</sup> Parramatta Light Rail (Stage 1) Westmead to Carlingford via Parramatta CBD and Camellia Environmental Impact Statement Volume 1A – Main document

<sup>3</sup> Parramatta Light Rail (Stage 1) Westmead to Carlingford via Parramatta CBD and Camellia Environmental Impact Statement Volume 1B – Main document

with Rydalmere and Melrose Park after crossing the Parramatta River would appear to be more consistent with previous planning for Camellia.

Option 1 would facilitate safe traffic movements to/from Grand Avenue properties, including the subject site via traffic signals at strategic locations.

Option 1 would also not preclude the future extension of the light rail line south of the Parramatta River (Stage 2 to Sydney Olympic Park). A Stage 2 extension of the light rail, with associated stops and infrastructure, would be consistent with previous planning for the new Camellia town centre.

Ultimately, if Stage 2 is rerouted north of the Parramatta River, then consideration should be given to relocating the stabling yard and maintenance facility. A spur line with no amenity for the community is not a positive urban design outcome and is not aligned with the assessment criteria, particularly the provision of city building outcomes. Alternative sites could be identified in the industrial area south of Rosehill Racecourse and adjacent to the existing Clyde to Carlingford rail line, refer to Figure 3 below.

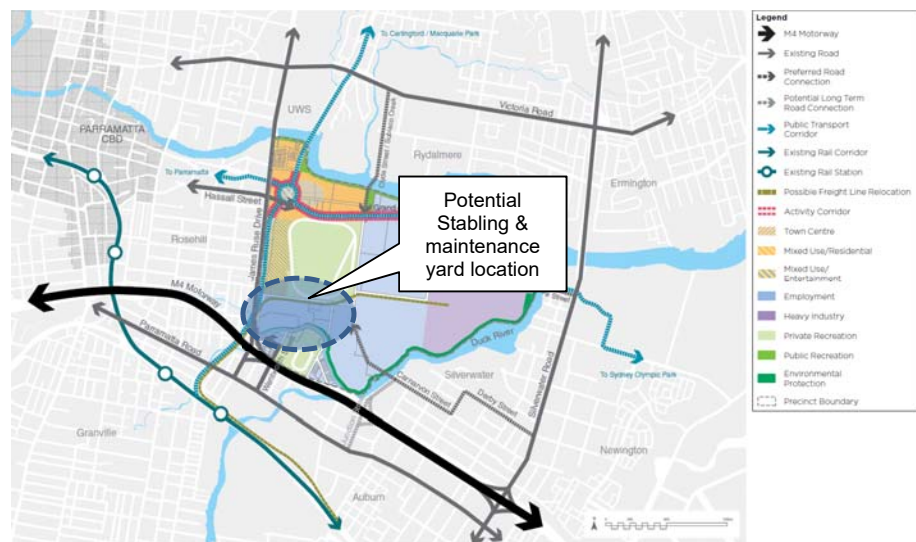


Figure 3 Potential alternate location for stabling and maintenance yard  
Source: Camellia Precinct, Land Use and Infrastructure Strategy, Vol. 1, July 2015

If Stage 2 does not travel through Camellia town centre, a spur line through the town centre and the site would be undesirable for the following reasons:

- It would restrict the development potential of the sites through which it runs
- It would restrict access to and through the future Camellia town centre
- There would be a requirement to retain formal vehicle crossings and dedicated easements for access
- There would be poor public amenity with a public transport service that is not readily available to the community.



However if the stabling yard and maintenance facility is retained in its current location, the connecting spur line could travel along the southern side of Grand Avenue, adjacent to Rosehill Racecourse. This would remove the access constraints to sites in the future town centre, and provide for better urban design outcomes in the town centre. The Camellia land owners are open to land swap arrangements to enable this to occur.

### **Existing Site**

Option 2 would also be problematic for the current land uses present at 11 Grand Ave. Currently the site houses four logistics buildings that accommodate a significant number of traffic movements. Managing these traffic movement across Grand Ave and then having to manage them again across the light rail spur line would provide a challenging operating environment for the tenants.

### **Potential Development**

GPT has tested the Department of Planning and Environment's draft urban design principles for Camellia town centre. The subject site at 11 Grand Avenue includes the following scale of development:

- Some 2,500 residential apartments
- Commercial and retail uses
- Open space

This development would form part of the overall development of the Camellia town centre. Other development sites that will form part of the town centre are expected to provide similar development.

Development of this scale will require appropriate access and transport infrastructure. As noted above, this would ideally include the future Stage 2 light rail line extension, including stops in the Camellia town centre and to the east.

### **Traffic Generation and Potential Road Works**

Residential development on the site of the scale above would have a significant traffic generation, potentially some 600 to 800 vehicles per hour two-way during peak periods.

The works identified in previous studies would likely be required to accommodate this traffic as well as traffic from other sites in Camellia. If Stage 2 of the light rail does not travel through the precinct, other measures, in addition to those identified in previous studies, may also be required.

## Summary

In summary, the main points relating to the traffic aspects of the site at 11 Grand Avenue in Camellia are as follows:

- i. the site is north of Grand Avenue and within the future Camellia town centre
- ii. the potential redevelopment of Camellia will strengthen demand for future public transport services
- iii. GPT is strongly supportive of the PLR project
- iv. Parramatta light rail EIS identifies two options for a light rail spur line connecting to a new storage yard and maintenance facility
- v. option 1, along Grand Avenue would better provide for integration and development within the future Camellia town centre
- vi. option 1 would allow for traffic management measures to be implemented to ensure a safer environment for all users
- vii. option 2 would travel through a number of sites, including the subject site
- viii. road crossings by light rail will likely require traffic signals to manage and control all movements
- ix. option 2 would sterilise development until the PLR has been complete
- x. option 2 would provide a poor urban design and community outcome in the event the Stage 2 does not run through Camellia town centre
- xi. the recent announcement for a Stage 2 light rail extension north of the Parramatta River would not readily serve the future Camellia town centre;
- xii. a light rail alignment along Grand Avenue, crossing the Parramatta River further east, appears to be more consistent with Camellia precinct planning;
- xiii. should Stage 2 not proceed through Camellia, the connecting spur line could travel along the southern side of Grand Avenue
- xiv. the stabling yard and maintenance facility could also be relocated South of Rosehill Racecourse;
- xv. the transport works identified in previous studies would likely be required to accommodate potential development traffic
- xvi. additional measures may be required if Stage 2 of the light rail does not travel through the precinct.

We look forward to continuing to work with the TfNSW and DPE in relation to the investigation into this important Precinct. Please do not hesitate to contact us on the details below if you wish to discuss any aspect of this submission.

Yours sincerely



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**The GPT Group**