

## Greater Sydney, Place and Infrastructure

IRF18/6435

### Plan finalisation report

**Local government area:** City of Parramatta

#### 1. SITE DESCRIPTION

The planning proposal applies to land at 181 James Ruse Drive, Camellia (the site) as shown in **Figure 1**. The site is comprised of some 37 individual lots and has a land area of approximately 68,000m<sup>2</sup>.



Figure 1: Subject Site bound in red.

The site is located approximately 1.5km east of the Parramatta CBD and is bound by James Ruse Drive to the west, the Carlingford-Clyde railway line, which is being converted to the Parramatta Light Rail, to the east and the Parramatta River to the north. Access to the site is by way of an access corridor to Grand Avenue, however a disused private access road at the south of the site includes an opening to James Ruse Drive.

Immediately adjoining and adjacent to the site is primarily industrial uses, with residential uses further to the south west and north of the site. The Western Sydney

University (WSU) Parramatta Campus is to the immediate north of the site and Rosehill Racecourse to the south.

The site has historically included heavy industrial uses and most recently was a James Hardie asbestos manufacturing location. As a result the of these historical land uses the site is contaminated.

The site is impacted by flood, with an area of high flood risk closest to the river. The majority of the site is within the 1 in 100 year flood level.

Running north-south adjacent to the eastern boundary of the site are two pipelines, including a high-pressure hydrocarbon pipeline. The pipelines require sensitive consideration to ensure that any future development responds to the potential hazard risk.

Items of State Heritage are identified to the north and south of the site being the former Rydalmere Hospital & Female Orphan School and Sewage Pumping Station 67 respectively.

At the foreshore, 'Wetlands' are an item of local heritage significance, which includes stands of mangroves. The item straddles the lot boundary and into the river and extends far beyond the site. These wetlands are also identified under the State Environmental Planning Policy (Coastal Management) 2018 and Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 which include provisions to protect and rehabilitate wetlands.

## **2. PURPOSE OF PLAN**

The planning proposal has been subject to amendments, however the proposal submitted to the Department for finalisation by Council seeks to:

- rezone the site from B5 Business Development to primarily B4 Mixed Use and part RE1 Public Recreation,
- increase the maximum floor space ratio (FSR) from 1.5:1 to 5.3:1,
- increase the maximum height of buildings from 9-12m to predominately 126m and part 35m at the northern part of the site,
- reduce the foreshore building line from 30m to 25m, and
- include site-specific clauses to:
  - require a 'Design Integrity Panel' process as part of future development applications,
  - prohibit development over containment cells required to address contamination,
  - ensure site remediation is completed for the total site and foreshore area prior to use of the land as facilitated by the draft LEP, and
  - require satisfactory arrangements to provide contribution to State infrastructure.

The planning proposal suggests that it will deliver approximately 3,200 dwellings.

## **3. BACKGROUND**

In 2014, the former Parramatta Council prepared a discussion paper considering the future of the Camellia Peninsula. The paper identified mixed use opportunities around the Camellia station and a range of business uses adjoining to provide a transition to more industrial uses at the eastern side of the peninsula (**Figure 2**).



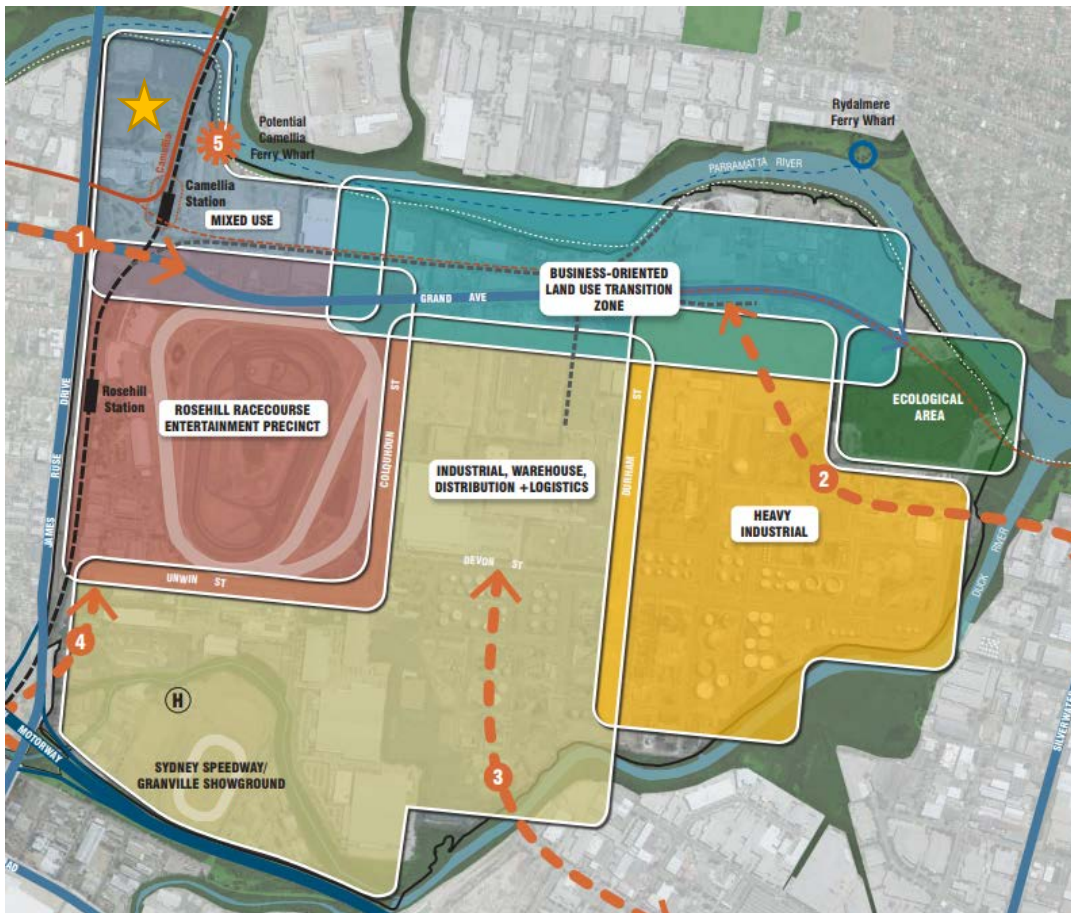


Figure 2: Draft land use concept plan, with location of subject site denoted with yellow star (source: Draft Discussion Paper - The Future of the Camellia Precinct March 2014)

In August 2015, a Land Use and Infrastructure Strategy (LUIS) for the Camellia Precinct was exhibited by the Department. The Strategy was prepared with Council and built on the direction of the 2014 Discussion Paper, identifying the subject site as 'mixed use/residential'. The Strategy proposed that following the exhibition, a rezoning proposal would be considered.

In 2016, the Greater Sydney Commission (GSC) released 'Greater Parramatta and the Olympic Peninsula (GPOP) Our true centre: the connected, unifying heart'. This document introduced the GPOP concept and set a vision for how the area should evolve to 2036. The GPOP vision identified four quarters with the subject site sitting within 'Next Generation Living Camellia to Carlingford'. The vision spoke to a major renewal area at Camellia Town Centre centred on the proposed light rail.

Responding to the GSC's vision, the Department prepared the Greater Parramatta Interim Land Use and Infrastructure Implementation Plan (LUIIP) which was exhibited in July 2017. The LUIIP carried forward the designation of next generation living for Camellia and identified an additional 10,000 dwellings by 2036. The LUIIP identified that a traffic and transport solution was required to progress planning for additional jobs and dwellings in the precinct.

In February 2018, the Department exhibited the draft Camellia Town Centre Masterplan. The draft Masterplan identified future land use patterns, heights and densities in order to provide 10,000 dwellings. The yield responds to constraints identified in the supporting studies including a transport and traffic study and landfill strategy that addresses flooding and contamination. The dwellings were proposed to be distributed across the precinct, resulting in approximately 2,000 dwellings being

allocated to the subject site (**Figure 3**). As such, there is an underlying inconsistency between the subject planning proposal and the strategic planning that has occurred in relation to density.



Figure 3 Excerpt from draft Camellia Town Centre Master Plan showing approximate location of site.

### 3.1 The GPOP Place-based Infrastructure Compact (PIC)

In November 2019, a draft GPOP Place-based Infrastructure Compact (PIC) was exhibited by Greater Sydney Commission. The PIC model seeks to align infrastructure and growth by modelling the cost to Government in servicing a new resident or worker. The GPOP PIC was a pilot for this approach and was an action identified in Metropolis of Three Cities.

The GPOP PIC identified that the potential cost to government of developing Camellia for mixed use purposes was higher than other precincts in GPOP. In its final recommendations, the GSC identified two potential planning pathways for Camellia. The first was to retain the land for urban services. This option would require refusal of the planning proposal as mixed-use residential is not consistent with the definition of urban services.

The second option was to reconsider the Camellia-Rosehill precinct in a holistic manner, taking into account potential place making opportunities that arise due to the construction of the light rail, synergies with Rosehill Racecourse and activation of the Parramatta River and Duck Creek corridor. In supporting this recommendation, it was recognised that a significant body of work is required to be undertaken to support an amenity-led mixed use precinct in Camellia, including, but not limited to, a remediation strategy, mitigation of flood risks, a traffic and transport solution and managing the interface between land use to address land use conflict.

In order to facilitate a holistic solution for Camellia-Rosehill, a Place Strategy will be prepared by DPIE, working in collaboration with Council, state agencies, landowners and

the community. It is important this process be undertaken in a collaborative manner to resolve the above issues and put in place a mechanism for infrastructure delivery.

Given the need to holistically plan for Camellia-Rosehill, it is considered that the site-specific planning proposal at 181 James Ruse Drive should be refused so as not to pre-empt the potential outcomes for Camellia that may be considered through the Place Strategy. Supporting this site specific rezoning may jeopardise this strategic piece of work that is required to be undertaken. Once the Place Strategy is prepared, there is potential for Camellia to be a State-led precinct.

#### 4. STATE ELECTORATE AND LOCAL MEMBER

The site falls within the Parramatta State Electorate. The Hon. Dr Geoffrey Lee MP is the State Member for Parramatta.

In March 2020, Dr Lee wrote to the Minister for Planning and Public Spaces on behalf of the landowner in relation to the planning proposal and the recommendations of the GPOP PIC. Dr Lee sought that a review be undertaken, and advice be provided on any outcomes in relation to the landowner's letter.

In considering the GPOP PIC, it was resolved that a Place Strategy be prepared for Camellia so that the locality can be planned for holistically. Determining that the planning proposal does not proceed is consistent with this approach as it enables further consideration of the best outcomes for the whole Camellia peninsula.

The site falls within the Parramatta Federal Electorate. Ms Julie Owens MP is the Federal Member for Parramatta.

To the Central (GPOP) team's knowledge, Ms Owens has not made any written representations regarding the proposal.

<b>NSW Government Lobbyist Code of Conduct:</b> There have been no meetings or communications with registered lobbyists with respect to this proposal.
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<b>NSW Government reportable political donation:</b> There are no donations or gifts to disclose and a political donation disclosure is not required.
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#### 5. GATEWAY DETERMINATION AND ALTERATIONS

The Gateway determination issued on 8 August 2014 (**Attachment B**) determined that the proposal should proceed subject to conditions.

The Gateway determination was altered on 24 September 2015 in response to an amended planning proposal which increased the maximum height and density and included new site-specific clauses (**Attachment C1**).

The Gateway determination was further altered twice to allow for extensions to the timeframe to finalise the LEP. The first alteration to extend, issued on 20 March 2017, provided for a further six months to 15 August 2017 (**Attachment C2**). The second alteration to extend was issued on 4 August 2017 to extend the timeframe for finalisation by a further six months to 15 February 2018 (**Attachment C3**).

## 6. PUBLIC EXHIBITION

In accordance with the Gateway determination, the proposal was publicly exhibited by Council from 23 December 2015 to 12 February 2016. This period of 8 weeks was beyond the Gateway conditions due to the Christmas period.

During the public exhibition 15 submissions were received, including 11 submissions from State Agencies which were required to be consulted as part of the Gateway Determination.

Two submissions were received from residents within the City of Parramatta LGA and a further two submissions from landowners within the broader Camellia Town Centre Precinct.

Local resident submissions objected to the potential impact on the river, height of buildings proposed and consideration for view impact including to heritage items. The potential impacts on the road and public transport network was also raised, with existing congestion on both noted.

The site is currently vacant with any future development commencing a shift in the appearance of this precinct and its relationship with its context including the river. How future development interfaces with and relates to the river will be key. Development provides an opportunity to revitalise foreshore land and provide new public access, however should be considered in strategic manner, rather than by ad-hoc decisions.

Two landowners within the Camellia Town Centre Precinct also made submissions, including Billbergia and Caltex, as owners of the adjoining Hunter high pressure liquid petroleum products pipeline. Caltex highlights the safety requirements that must be considered upon redevelopment including excavation setbacks, tree planting and vehicle maintenance access.

The submission from Billbergia, landowner of the adjoining development site to the east of the site, highlights the need for public infrastructure required to support the redevelopment of the precinct, should be borne equally by all landowners. The submission notes that the provisions of any VPA with the proponent may impact the works required to service the landowner's site.

The Billbergia submission also notes that detail on foreshore open space connectivity at the rail bridge has not been provided and includes a residue lot which may provide a barrier to integration. The submission further details the draft Master Plan's designation of the Billbergia site as the core of the town centre and therefore primary location of commercial floor space. The role for commercial floor space at the proponent's site is suggested to serve the needs of the residents within the development.

On 12 February 2018, Council considered a report providing a status update on the outstanding issues relating to this proposal. At this same time the draft Camellia Town Centre Masterplan prepared by the Department was on exhibition. A supplementary report was then provided to the same Council meeting with additional information.

The report recommended that officers continue to work to resolve the outstanding issues but also included a series of options should Council be compelled to make a decision. Council resolved to adopt one such option and endorsed the exhibited planning proposal for submission to the Department to progress to finalisation. This resulted in a number of outstanding matters that had been raised by public agencies needing to be resolved prior to finalisation.



The Department commenced work to resolve issues however its resolution, requires a decision to be made on the future of Camellia more broadly as the GPOP PIC recommends the locality be retained for urban services. While the Department notes the issues raised by the GSC, it is considered that the development of a Place Strategy for Camellia will enable a land use vision and place outcomes to be developed, in addition to how to fund and implement infrastructure required to support the precinct.

## **7. ADVICE FROM PUBLIC AUTHORITIES**

Council was required to consult with a number of public authorities in accordance with the Gateway determination:

- Environmental Protection Authority (EPA);
- Office of Environment and Heritage (OEH);
- Roads and Maritime Services (RMS);
- Sydney Trains;
- Sydney Water;
- Endeavour Energy;
- Department of Primary Industries (Office of Water & NSW Fisheries) (DPI);
- NSW Health;
- NSW State Emergency Services;
- Western Sydney University (WSU);
- Sydney Metropolitan Catchment Management Authority; and
- Department of Education and Communities.

Of these Council was required to consult with the EPA, Endeavour Energy, Sydney Trains and RMS prior to commencing the public exhibition with any comments to be reflected in the exhibited proposal. Issues raised by agencies are discussed below.

### **7.1 Utility servicing and infrastructure**

Utility providers noted that some improvements would be required to service the site suggesting that this may be, in part, addressed through the DA stage. Endeavour Energy identified that work would be required to service the site and that satisfactory arrangements be in place to ensure required infrastructure could be funded.

Sydney Water noted there was sufficient capacity in the water servicing system to service only a portion of the yield sought by the proposal and that full development of the site and within the precinct more broadly would likely require improvements to the network. Wastewater servicing was noted to be nearing capacity and the submission highlighted recycled water servicing as an opportunity.

State infrastructure provision was also raised by a number of agencies who requested that satisfactory arrangements be in place prior to rezoning going ahead, including the Department of Education. The Department's Urban Renewal team noted that a Special Infrastructure Contribution was being considered in accordance with the Interim LUIIP.

Agencies noted that infrastructure planning had not considered the level of growth sought by the proposal. This is noted by NSW Health (Western Sydney Local Health District) in relation to improvements to Westmead Hospital and the Department of Education.

TfNSW notes that work is still underway to determine the extent of land required for James Ruse Drive upgrades. Land is also noted to be required for potential Stage 2 of Parramatta Light Rail with options provided by TfNSW to ensure rezoning and future development considers this requirement.

TfNSW also identified some concerns with traffic modelling and the draft TMAP provided in support of the proposal and assumed upgrades to support development, including additional traffic lights at James Ruse Drive. Lower car parking rates are also suggested to support use of public transport in the vicinity.

## 7.2 Health and safety

Concerns for the health and safety of future residents were raised by various agencies due to land uses, high pressure pipelines and major roads in the vicinity. EPA highlights the need for a strategic planning approach to guide the redevelopment of the precinct to ensure environmental outcomes are delivered. EPA suggested a report provided in support of the planning proposal did not sufficiently address issues arising from nearby land uses, such as air quality impacts.

NSW Health also notes the potential health impact of development fronting a major road and the need for open space to support good health of future residents.

The Department noted that the site's location adjacent to a high pressure pipeline requires consideration of risk to the future population and setbacks to address this.

## 7.3 Contamination and remediation

The site is known to be heavily contaminated and contamination is present in much of the adjoining land. Concern was raised by submissions for a piecemeal approach to remediation for the site and broader precinct which may put future residents at risk of exposure.

EPA and RMS both noted the contamination of foreshore land, which is in RMS ownership. Submissions suggest remediation of the foreshore must be completed with the full site. RMS notes an openness to discuss remediation of the land but does not accept any financial liability for such works.

DPI expressed that it does not support the proposed scale of mangrove harm which will be required through remediation of the foreshore. Advice from Fisheries would be required under the *Fisheries Management Act 1994* at DA stage. EPA also raised the need to consider the implication of a failed remediation on redevelopment.

WSU highlighted concern for contaminate exposure for students and workers on its site located on the northern side of the river. EPA also raises the protection of easements in the vicinity which may contain contaminants and the potential for exposure during the upgrade of services.

The Department and other submissions have noted that the density sought is required to ensure feasibility given the remediation costs. The Department suggested that investigations informing precinct work found lesser densities would still be feasible despite the cost of remediation. The Department also noted that additional development controls may be considered to ensure that the staging of development does not put residents at risk while remediation is ongoing.

The proponent has obtained development approval for the remediation of its site and is also seeking to remediate the foreshore land. While this is noted, it is clear that a precinct wide remediation strategy is required to be developed. While the Camellia Town Centre Masterplan was supported by a strategy, this matter is required to be reviewed holistically with input from key stakeholders, including Council, landowners and the EPA to ensure that this significant matter is appropriately resolved.

## 7.4 Environmental issues



DPI noted the significant stand of mangroves which exists below the mean high water mark which provides important fish habitat. DPI proposed a 40m riparian buffer in order to protect the aquatic habitat and seeks foreshore land also be zoned E2 Environmental Conservation for greater protection. This matter needs to be further considered in the context of the need to remediate the foreshore land.

### 7.5 Flooding

OEH noted that flood analysis provided in support of the planning proposal may be inaccurate due to an older base model. The studies are also noted to not account for overland flooding, which may further increase flood levels.

The Department noted that the studies completed as part of precinct planning shows the site contains high flood hazard and will require careful design consideration. Emergency evacuation in a flood event is also noted as a key consideration due to the high flood risk and low-lying nature of the site.

This issue, including an appropriate fill strategy, needs to be further considered as part of the Place Strategy to ensure appropriate resolution of finished levels across the Precinct.

### 7.6 Heritage

OEH identified that there is a registered Aboriginal site to the south of the site and Aboriginal Cultural Heritage assessment should be undertaken, particularly in response to the ground disturbance required as part of remediation.

WSU suggested the proposal has insufficient justification to support the heights proposed and that greater consideration for amenity, views and impact to State Heritage listed 'Female Orphan School' on the WSU site is required.

Further work is required to resolve this issue as part of the Camellia Place Strategy.

### 7.7 Scale of development

WSU support generally the renewal of the site and broader area but objects to the scale of heights proposed. Greater access and connection along the foreshore are also noted as an opportunity with appropriate height seen as crucial to achieve enjoyment of this land.

Western Sydney Local Health District outlined concern for the level of density proposed and its potential impact on population health.

The Department noted some concern for development capacity of the broader precinct being jeopardised by a greater share than envisaged being pursued through the planning proposal. Capacity for the total precinct is noted to be limited by the transport network. Potential overshadowing of the town centre is noted in the submission and further analysis of view impact is suggested.

The Department also notes that the proposal seeks to provide a substantial quantity of retail floor space outside of the town centre location envisaged by the Land Use and Infrastructure Strategy.

This issue needs to be further resolved, having particular regard to the capacity of the entire precinct.

### 7.8 Council response

Council considered a report in February 2018 which outlined these submissions and which noted that a number of issues remain unresolved. A recommendation was provided to Council to continue to work with the proponent and agencies on these

issues. Council resolved to submit the proposal to the Department to progress the finalisation of the LEP.

### 7.9 Department comment

Many of the State Agency submission raise issues which require a holistic approach to resolve identified issues and in some cases conflict. Rezoning of the subject site ahead of a broader plan, may jeopardise the best outcome for the precinct.

Submissions also note that the scale of development may need to be further considered and in particular respond to the context and broader precinct development.

## **8. ASSESSMENT**

### 8.1 Built form and density

As noted in the Department's submission and through the exhibition of the draft Camellia Town Centre Master Plan, density within the precinct needs to be carefully considered. In July 2017, the Greater Parramatta Interim Land Use and Infrastructure Implementation Plan (Interim LUIIP) identified a forecast growth of 10,000 dwellings to 2036 for the Camellia Precinct within a future town centre. The Interim LUIIP is supported by a section 9.1 Direction requiring planning proposals to be consistent with the Interim LUIIP.

The draft Camellia Town Centre Master Plan (draft Master Plan) was exhibited from 9 February to 29 March 2018. Building on from both the 2015 LUIS and 2017 Interim LUIIP, the draft Master Plan provides the urban design framework for the future town centre. This includes details of indicative built form (height and floor space ratio), proposed open space and community infrastructure, such as a potential new primary school.

The draft Master Plan identifies a maximum of 10,000 new dwellings across the 40 hectare town centre, delivered equitably across the town centre based on a desired urban design outcome surrounding a new light rail stop being delivered as part of Parramatta Light Rail (Stage 1) and responding to constraints identified in the supporting studies including a transport and traffic study and landfill strategy that addresses flooding and contamination.

The planning proposal exhibited by Council provides for 3,200 dwellings which is a significant portion of the total yield. This 32% share does not correlate to the size of the site, which Council notes is approximately 18% of the precinct. It is estimated that the Master Plan would result in approximately 2,000 dwellings on the subject site.

The Department has concerns that the density proposed will result in a poor urban form and needs to be further considered in the context of the broader precinct and to ensure an appropriate interface to the foreshore area. These concerns were also raised through agency and public submissions. A report provided to Council also notes that inequitable distribution of dwelling yields may prevent sites from redevelopment and therefore desired remediation of the precinct and foreshore.

Following submission of the proposal to the Department for finalisation, the proponent has provided further revisions of the site's concept plan.

Built form must be carefully considered across the precinct with density responding to each site's constraints and those of the precinct as a whole. The built form must also consider the desired place outcomes and vision for the locality to prevent a series of developments which bare no relationship to each other. It is considered that the development of a Place Strategy will allow for a built form and land use vision which responds to constraints and opportunities.

### 8.2 Remediation

Both the subject site, and the broader Camellia peninsular include contamination which must be remediated prior to use as a mixed-use precinct. Ministerial s9.1 Direction 2.6 Remediation of Contaminated Land was introduced in April 2020 and replaces previous consideration under SEPP 55 - Remediation of Land at the rezoning stage. The Direction seeks to reduce risk to the health of humans and environment and requires the planning proposal authority to be satisfied that remediation of land can and will occur prior to the use of the land for certain purposes.

As noted in agency submissions, there is concern that a piece-meal approach to remediation may put new residents at risk while the site, and potentially precinct, is progressively developed. Holistic consideration of contamination and a plan for remediation allows for these concerns to be addressed. Staging and foreshore remediation can be planned for, providing greater certainty for developers and any potential future residents.

A precinct wide approach can also consider development feasibility in response to remediation costs and built form analysis. This will ensure that feasibility is not held as evidence for increased site-specific density where it may otherwise not be appropriate.

Progressing the site-specific rezoning while remediation uncertainty remains is considered unacceptable. Development of a Place Strategy for Camellia allows a framework for remediation to be addressed through which considers appropriate outcomes for the whole precinct, including foreshore areas.

### 8.3 Flooding

The site is affected by flood with varying levels of risk across the site, with the areas of greatest flood hazard along the Parramatta River. The majority of the site is impacted by the 1 in 100 year flood which extends along portions of James Ruse Drive, shown in **Figure 4** below.



Figure 4 - 100 year Annual Recurrence Interval Flood Extent and Levels with approximate site boundary shown in red (source: Cardno, 2015)

As the site, and broader precinct, will require remediation the resulting landform following fill may influence flood behaviour. In preparing the Draft Camellia Town

Centre Master Plan, the interplay between these two components was a key area of consideration.

Stage 1 and 2 Flood Studies were carried out to support the draft Master Plan, informed by a Landfill Strategy commissioned to create a uniform ground plane. A consistent flood modelling approach was also recommended to be adopted for the precinct, which was developed to test concept development.

In preparing the draft Master Plan, it was noted that further consideration for the impact of development on the floodplain, within the precinct and to properties to the west, would be required. Direction 4.3 Flood Prone Land also calls upon the need to consider the impacts both on and off the subject land. Understanding this impact is difficult in isolation, when the remainder of the precinct is unresolved.

Evacuation and infrastructure required to manage flood levels were also identified as requiring further consideration to support development in the precinct. Due to the low-lying nature of James Ruse Drive, the road is also affected by flooding and presents evacuation challenges both for the site and the precinct. Flood modelling prepared to support the draft Master Plan also identified the need for a floodway along the western edge of the site, extending along the northern boundary.

While the proponent has provided flood studies to support its intended outcome, it is recommended that the issues relating to flood should be considered across the precinct allowing for a holistic approach to evacuation and landform. The final landform and development concept for the site has the potential to influence flood considerations across the precinct and are more appropriately addressed through a Place Strategy.

#### 8.4 Land Use Conflict

Camellia contains a mix of industrial uses which presents a challenge to a progressive urban renewal program. As noted in agency submissions, industrial uses present health risks through reduced air quality and pollution. Interfaces with long term and short term industrial uses needs to be carefully considered and planned for.

The site has some separation from heavier industrial uses to the east of the precinct and is adjoined by an industrial unit complex with varying uses. Redevelopment of the site as intended by the proposal would create an isolated pocket of mixed use. Isolation is furthered by road access via an access handle, as entry/exit via James Ruse Drive may not be supported. Conflict between residents' vehicle movements and those related to industrial uses would also be likely.

Planning commenced by the Department considered a gradual transition to industrial uses and considered open space buffers and road improvements. Allowing the site to progress while the remainder of the precinct does not have a pathway forward may create both precedent for piecemeal redevelopment and impact human health. Progression of a Place Strategy will allow for consideration of appropriate transitions and interfaces with non-residential uses in the precinct should residential uses be supported.

#### 8.5 Infrastructure

The Draft Master Plan included an infrastructure list to support the development of the new Town Centre. This included active and road transport upgrades, a potential primary school and open space. Additional local infrastructure would also likely be required to support new residents.



It is acknowledged that the proponent has provided offers to enter into planning agreements to contribute towards local and state infrastructure. However, it is considered that infrastructure requirements must be considered across the precinct and in response to any agreed future residential population. Utility improvements were also noted to be required through submissions, however should the remainder of the precinct not go ahead, their delivery may be challenging.

Creation of an infrastructure list should respond to an agreed vision for Camellia, determined through the development of a Place Strategy. This will allow for funding mechanisms to deliver infrastructure to be considered and secured prior to rezoning progressing.

## **9. RECOMMENDATION**

It is recommended that Minister's delegate as the local plan-making authority determine not to make the draft LEP under clause 3.36(2)(a) of the Act because:

- Camellia requires a clear and agreed vision which all stakeholders can work towards, this is proposed to be defined through the development of a Place Strategy;
- Camellia also needs careful and holistic consideration of issues such as remediation, land use, built form and flood which are more appropriately addressed through a Place Strategy; and
- progression of a site-specific proposal may jeopardise the achievement of precinct wide outcomes and vision.



5/11/2020

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4/12/2020

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