



CF/JH
15942
26 February 2016

Ann-Maree Carruthers
Director Urban Renewal
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: The draft Bella Vista Priority Precinct Exhibition

Dear Ann-Maree

**SUBMISSION TO THE DRAFT BELLA VISTA STATION PRECINCT PROPOSAL
11-23 LEXINGTON DRIVE & 1-3 MERIDIAN PLACE, BELLA VISTA**

This submission has been prepared by JBA on behalf of Capital Bluestone who represent the owners of a significant land holding within the Bella Vista Priority Precinct, being 1-3 Meridian Place and 13-15, 17-19 and 21-23 Lexington Drive, Bella Vista (the Site). This land is identified in **Figure 1**.

We support the initiative of the Department in reviewing the opportunities presented by the new North West Rail Link and in particular the opportunities to promote Transit Orientated Development (TOD) around the new stations. We also support its overarching aim for the precinct of promoting employment opportunities and a greater supply of housing, including greater housing choice in locations with excellent access to public transport, retail centres and other services such as schools. Capital Bluestone however wish to raise a number of issues with respect to the current proposal particularly as it affects the identified land. The principal concern is that the current proposal misses an opportunity to create a vibrant mixed use community that is both an attractive place to work and reside with a quality public domain.

With appropriate planning mechanisms in place the site could deliver significant employment opportunities within a mixed use development that provides a diverse range of uses and creates a vibrant 24 hour economy. The site is also capable of supporting increased density along with improvements to the public domain. One example of how this might be achieved is shown in the urban design concept scheme prepared by Turner and included at **Attachment A**.

1.0 THE SITE

The Site is shown in **Figure 1** below and it is situated some 390m to 720m to the south east of the Bella Vista Station, which is currently under construction. The Site includes four lots and has a total area of approximately 3.94 ha. The northern most lot contains a two storey commercial building and the lot to the south of this is undeveloped. The two southernmost lots contain commercial buildings up to two storeys in height, and includes the Bella Vista Hotel on the corner of Lexington Drive and Woolworths Way.

The site is currently zoned B7 Business Park with a FSR of 1:1 under The Hills Local Environmental Plan (LEP) 2012. A RL height limit of 116m is also applicable under this LEP. The site would retain the Business Park zone under the State Government's draft Priority Precinct but be subject to a new maximum building height of RL 128m and Floor Space Ratio (FSR) of 2:1.



Figure 1 – Site Location
Source: Google Maps

2.0 DRAFT BELLA VISTA PRIORITY PRECINCT

The draft Bella Vista Priority Precinct aims to guide urban renewal around the Bella Vista Station over the next 20 years. It was informed by the 2013 North West Rail Link (NWRL) Corridor Strategy and establishes a vision to transform the precinct into a vibrant, connected centre which is underpinned by the principles of TOD. It will provide opportunities for increased employment and housing capabilities within walking distance of the station; while ensuring the local amenity, open spaces and natural environment are protected.

The draft Priority Precinct aims to facilitate the construction of 4,200 new residential dwellings and provide 9,400 new jobs by 2036. This is a slight decrease to the NWRL Strategy of 4,400 dwellings and 10,500 jobs which may simply reflect the different time periods of the two documents (NWRL Strategy in 2013 – 20-25 year vision; draft Bella Vista Precinct Plan 2015 – 20 year vision).

The area south of the Bella Vista Station, including the subject site, forms part of a well-established business park and is conceived as an employment area. The NWRL Corridor Strategy states that the Bella Vista Business Park is a logical extension of the Norwest Business Park to the west and it is accordingly identified as a business and commercial destination in the draft Priority Precinct. The draft Priority Precinct provides a FSR of 2:1 and a maximum height limit of RL128m for the area to encourage the turnover of older buildings and the uptake of vacant land to increase jobs and business activity.

On top of the employment goals, the draft Priority Precinct also expresses the desirability of improving the street environment to make it a more pleasant place for pedestrians and cyclists. In accordance with the community consultation undertaken for the precinct, it encourages high quality public places, open space and connectivity to increase the amenity for workers and residents. As an employment only precinct it risks only being, or largely, active during the

working week with the streets, open space linkages and public domain generally devoid of life before and after the working day and at weekends. This raises ongoing concerns with the inherent safety of the precinct for those passing through or being there outside working hours.

A mixed use development would more readily fulfil the vision of vibrant well connected communities with good transport links, jobs and access to services.

3.0 TURNER CONCEPT SCHEME

Turner have prepared a concept scheme for the Site which demonstrates one way in which it could be redeveloped in line with the principals of TOD to create a vibrant mixed use precinct. The scheme includes seven buildings comprising three mixed use commercial/residential buildings and one commercial building along Lexington Drive, and a further three residential buildings to the rear.

To provide a variety of building height and free up the ground plane, buildings range in height from 14 to 23 storeys. Whilst this represents an increase of approximately four storeys above the proposed height control at the north of the site and eight storeys towards the south these types of building heights are proposed to the north in the town centre. A total FSR of 3:1 is achieved across the site and includes 2:1 of residential use and 1:1 of commercial uses.

The Site provides a large block of land and the concept scheme highlights its potential to deliver a high level of open space and improved connectivity through the site. Ground floor retail uses front the open space and through links to provide activation and to enhance the amenity for pedestrians and cyclists.

The concept scheme includes five levels of basement parking and a further three levels of parking above ground. The above ground parking has been designed with sufficient floor to ceiling heights to allow for their adaption to alternative uses overtime as the need for parking in the precinct reduces. Parking demand is anticipated to decrease with the completion of the rail line and the changing nature of employment, and it is intended that these parking levels would be converted to additional commercial uses.

The Turner scheme is one way in which the precinct could be turned into a creative mixed use space with improved connectivity and an enhanced public domain. The benefits and planning considerations associated with introducing a mixed use zoning and increased height and FSR over the Site are considered below.

4.0 OPPORTUNITY FOR MIXED USE DEVELOPMENT

The importance of growing employment opportunities within the Bella Vista centre is recognised and supported, however the means of achieving this objective does not have to be through the exclusion of other land uses which would better activate the area and help achieve the urban design and public amenity goals for the draft Priority Precinct.

The precinct would benefit from a true mixed use approach, given the proximity to the station. The Site and the broader precinct is currently characterised by a business hours environment and is consequently devoid of life and character outside of these hours and on weekends. The construction of the new train station presents the opportunity to introduce other uses that will activate the precinct outside of business hours, in line with a vibrant 24 hour economy. For example, providing residential buildings on the Site would complement the commercial uses and provide increased surveillance for residents and users of the precinct and better utilise infrastructure.

Providing a mix of uses within proximity to the centre will also help increase the performance and viability of the Sydney Metro Northwest as it will support two-way peak travel. The activation encouraged by mixed use development will see the station used in both directions during the peak and will increase patronage throughout the day and night. This is important to ensure maximum benefits are derived from the significant investment in public transport infrastructure.

The mixed use approach also enables business which support the commercial uses, for example cafes, medical centres, pharmacies and convenience retailing, making the businesses more viable as they have the opportunity to also serve a residential community outside normal working hours.

5.0 RETENTION OF EMPLOYMENT GENERATING USES

5.1 Changing Nature of Employment Lands

The Bella Vista precinct is currently transitioning from low intensity employment typologies, such as warehousing with limited amounts of commercial space, and undeveloped land to higher density employment uses typical of commercial centres. It is expected that the area will experience growth in professional, scientific, technical, health, finance and retail industries. As such, the amount of warehouse floor space is likely to decrease overtime as the precinct evolves and more of the land is redeveloped for offices and higher order business uses. Therefore, assuming adequate redevelopment incentives are in place redevelopment of land to provide commercial floor space will provide significant employment opportunities. Indeed the employment targets identified in the Precinct Plan are likely to be met simply through the changing nature of employment and the intensification of uses, whether or not the FSR is increased for employment activities.

Approximately 216 people are currently employed across the Site in a mix of warehouse and limited office uses. If the site were to be redeveloped for higher order economic uses with reduced warehousing uses, it would accommodate up to 1,576 workers based on a FSR of 1:1. The increase would meet 15% of the target.

As shown in the table below the employment target for the precinct will easily be achieved at a FSR of 1:1 due to the changing nature of employment in the business park (i.e higher intensity employment uses) and employment within the main retail centre and around the railway station. Employment targets will be met so long as the incentive to redevelop the sites exists. Therefore rather than increase the FSR of employment uses, it is considered appropriate to provide additional FSR for residential and other uses to incentivise redevelopment that will also contribute to achieving a high quality public domain and substantial open spaces.

Table 1 – Employment Generation

Site	Actual Current Employment	Employment Potential of Existing Use and GFA	Employment Potential at 1:1	Employment of Turner Concept Scheme
Site 1	96	Warehouse (2,700m ²): 36 Tavern (1,800m ²): 51	Commercial (9,237m ²): 369	Commercial (9,354m ²): 374
Site 2	0	Warehouse (2,000m ²): 27 Office (1,023m ²): 41	Commercial (8,932m ²): 357	Commercial (9,115m ²): 364
Site 3	-	-	Commercial (10,204m ²): 408	Commercial (10,344m ²): 414
Site 4	120	Warehouse (3,010m ²): 40 Office (1,479m ²): 59	Commercial (11,057m ²): 442	Commercial (11,169m ²): 447
Total	216	254	1,576	1,599

**Assumes 1 worker / 25m² for commercial uses and 1 worker / 75m² for warehousing*

5.2 Planning Mechanisms to Ensure Mixed Use

The area has been established as an employment precinct and it would be undesirable to erode this function. A number of planning attempts at encouraging mixed use development elsewhere in Sydney have relied on the market to determine the land use make up. In times of residential shortage and rising residential property prices, this has led such areas to be predominantly residential and have been less successful at providing mixed use development. However, the provision of additional uses in the precinct can be done in a way that maintains and builds on employment opportunities. There are many planning tools available to ensure one land use does not take precedence over another. For example controls can specify a minimum level of a permitted type of land use such as employment generating uses on a site/development and thus maintaining a strong employment focus. It would be important that any such Development Standards are not capable of being varied so that certainty of employment uses is attained.

6.0 CONSULTATION

Extensive community consultation was undertaken during the preparation of the draft Priority Precinct proposal. The vision presented by the community involved a vibrant and well-connected community containing open space, cafes, shops, and community facilities. Safety and security, especially around the station at night was also a clear priority identified throughout the consultation period.

These characteristics are all typical of true mixed use precincts and can only be achieved by encouraging a wide range of land uses, including an appropriate amount of residential use. Through the introduction of residential uses it is possible to provide these benefits and maintain the employment generating function of the centre. Residential uses establish a local population to support businesses and generate activity outside of standard working hours. It also provides jobs close to home, allowing people to live and work in the one centre.

7.0 URBAN DESIGN AND PUBLIC DOMAIN

The proposed increase in density and introduction of residential uses presents the opportunity to create an integrated live/work precinct with meaningful urban design and public domain improvements.

The Site provides a large block of land that has the potential to deliver on integrated development with a balance of open space and built form that grows from the current business park setting, and develops it into an urban fabric that provides out-of-hours activation and which respects the pedestrian user. The concept scheme offers two large, publicly accessible plazas that are activated with retail uses. This includes a new through-site link that provides permeability to adjacent future development and to the Green Link. The open space will allow for large amounts of deep soil that provides water sensitive urban design benefits, as well as delivering large scale landscaping opportunities. The extent of open space and landscaping provided in the Turner concept scheme is shown at **Figure 2**.

Through the significant open space and landscaping opportunities the Site maintains the approach of a park type setting, while incorporating elements of urbanity for the pedestrian by way of clearly defined streets, plazas and through-site links. As a result, the proposed modifications to the draft Priority Precinct sought in this submission can provide a high quality and activated public domain in line with the findings of the community consultation.



Figure 2 – Concept Design
Source: Turner

8.0 TRAFFIC GENERATION

The Bella Vista Transport Plan considers the potential traffic impacts of the growth planned under the draft Priority Precinct. The Transport Plan models the Level of Service (Los) for the performance of key intersections in the precinct and outlines the network upgrades recommended to support the future growth.

Despite planned upgrades and the signalisation of local roads to support the Priority Precinct, the transport plan concludes that additional capacity will be required to accommodate future growth in traffic flows generated by the Precinct and other growth in Sydney's North West by 2036. As such further upgrade works will be required regardless of whether densities at the Site are increased. The future network upgrades could account for additional traffic generation and the funding of the works can be assisted through the s94 Contributions raised by increased development yield.

A diverse mix of uses is likely to result in a more dispersed flow of traffic throughout the day compared to a commercial only precinct which would be subject to business hour peaks. Further to this, the trend towards a lower dependency on car use in the region (with increased walkability and improved public transport) will mitigate future network congestion and the adoption of SEPP 65 parking requirements will likely reduce the amount of car use in the precinct over time. The introduction of residential uses would also support the notion of providing jobs close to home which increases the viability of utilising alternative transport modes including walking and cycling.

9.0 BELLA VISTA FARMHOUSE

The Bella Vista Homestead Complex is an item of State Heritage set within a large area of open space located at the southern end of the Priority Precinct. The NWRL Strategy and the draft Priority Precinct both recognise the need to minimise the impact on views from Bella Vista Farm.

Increasing the height of buildings at the Site will not increase the impact of views from the homestead. The Hills Shire DCP 2012 identifies the significant views to and from the Bella Vista

Homestead which are mainly concentrated at the south of the site in the direction the homestead is orientated. Two view lines of the homestead from the north are identified from Norwest Boulevard and the existing low density residential area to the north of the farm. The Site is located to the north of Norwest Boulevard, approximately 650m from the farm house, and will therefore not impact this sight line.

As shown in **Figure 3** the sight line towards Bella Vista Station is already identified for tall buildings within the centre and therefore the proposed increase will not cause any significant further impact on distant views. Future development at the site would need to consider the siting of buildings and the preservation of sight lines between buildings.

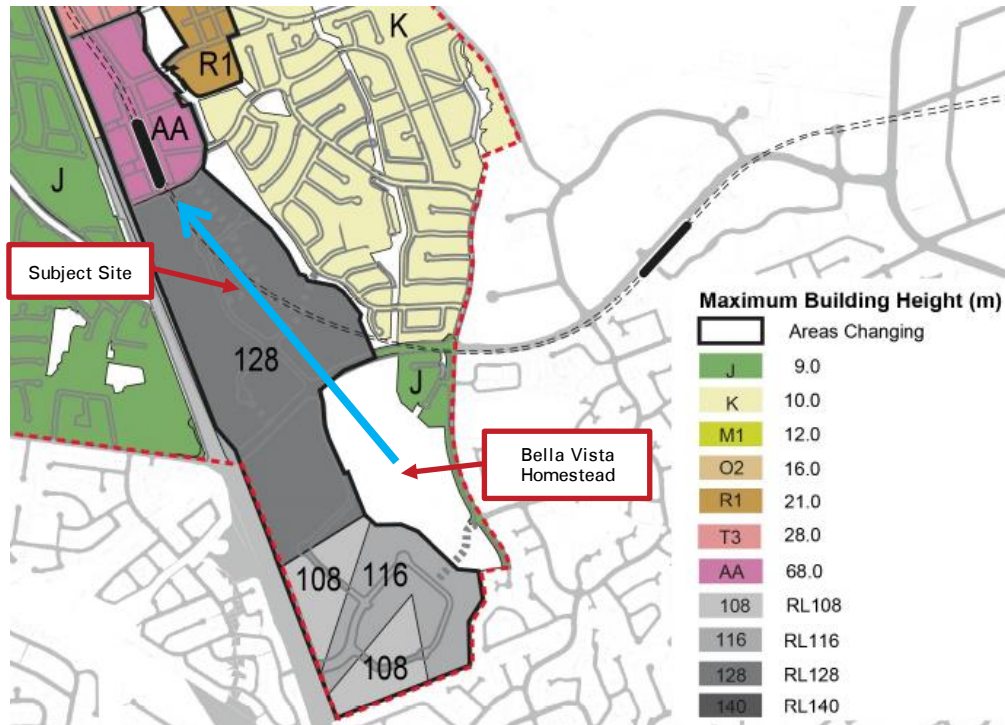


Figure 3 – Proposed maximum building height
Source: Department of Planning & Environment

10.0 S117 DIRECTIONS

Allowing residential uses at the Site is consistent with the s117 Direction - 5.9 North West Rail Link Corridor Strategy in that it will promote the mixed use principles of transit-oriented development. The proposed vision for the Site would also help achieve the growth projections and improve the public domain to achieve the desired future character of the area and vision as being "The Hills premier living and business precinct". It should be noted that the Site involves significant land holdings within the precinct and is therefore capable of delivering the desired outcome in the short to medium term subject to market factors.

11.0 CONCLUSION

The Site is ideally situated to support mixed use development given its proximity to the future station. It is considered that the Site has potential to meet the employment objectives whilst providing a mix of residential and other complimentary uses that will improve the public domain and vibrancy of the precinct.

Considering the above submission, a mixed use zoning has the potential to create a vibrant and integrated development at the Site. The Site is also capable of supporting increased density which will help stimulate redevelopment and contribute to local infrastructure services through increased s94 Contributions. A concept scheme prepared by Turner demonstrates one way in which a mixed use development of up to 3:1 and a building height up to 68m can be

accommodated on the Site to achieve the employment goals and improve the public domain and planning outcomes of the precinct. Capital Bluestone would welcome the opportunity to further discuss this submission with the Department in their consideration of planning controls for the area.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or jharrison@jbaurban.com.au.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'James R. Harrison', with a stylized flourish at the end.

James Harrison
Director