

31 March 2017

Maria Atkinson AM
District Commissioner
Greater Sydney Commission

SUBMISSION TO THE DRAFT CENTRAL DISTRICT PLAN 160 BURWOOD ROAD, CONCORD

Dear Ms Atkinson,

This letter has been prepared on behalf of FreshFood Sydney Pty Ltd, owners of the 'Bushells site' at 160 Burwood Road, Concord. FreshFood has engaged Urbis to review the draft Central District Plan in respect to its implications for the site's redevelopment potential and future uses.

1. SUMMARY

The site consists of a large industrial building, formerly known as the 'Robert Timms Factory' or 'Bushells' Factory, and is located approximately 12km from Sydney CBD, 15 km from the Parramatta CBD, 1 km walking distance from Parramatta Road and 2.2 km from Burwood town centre. The regional context of the site is shown in **Figure 1** below.

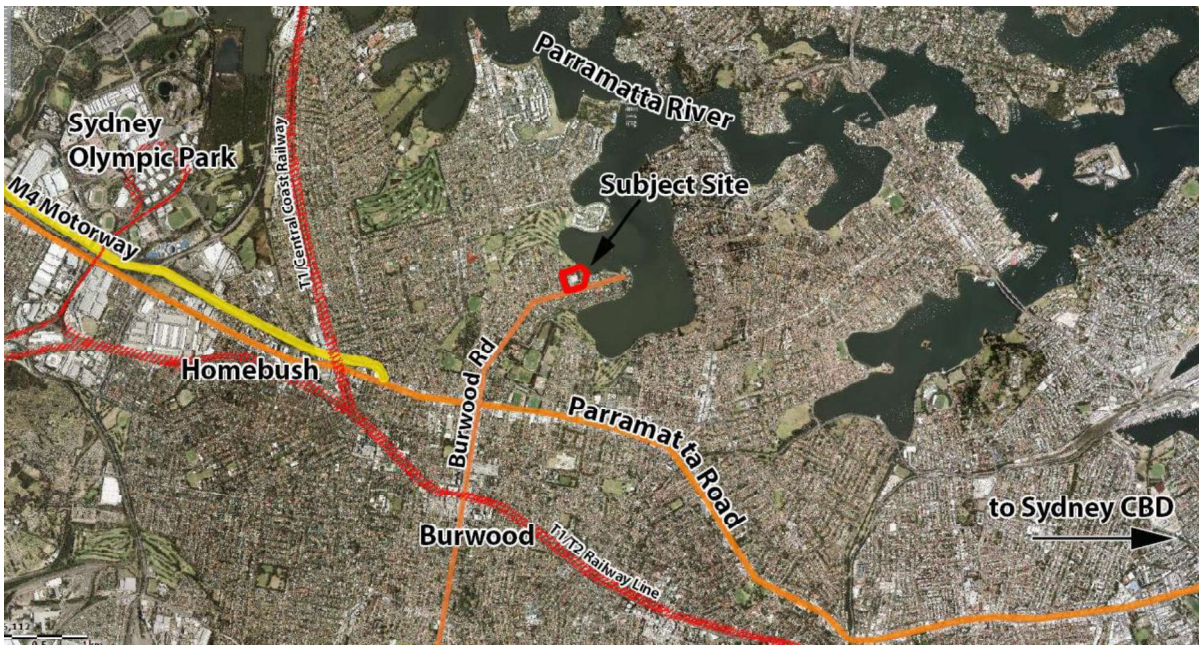


Figure 1 – 160 Burwood Road, Concord within its regional context

The continued suitability and appeal of the site for its current coffee-making industrial use is constrained by the site's location on Parramatta River, the surrounding residential area, poor heavy vehicle access and isolation from other industrial uses and major transport routes.

An Economic Impact Assessment (EIA) undertaken by Hill PDA has found that, with the exception of activity around Port Botany, the Central Subregion industrial market (within which the subject site is located) is characterised by low levels of demand and new lease activity. This low demand for traditional industrial uses has resulted in the development of alternative uses within the industrial areas such as hardware retailing, showrooms and self-storage facilities rather than manufacturing and urban support services.

Moreover, the factory has reached the end of its useful life and an alternative location is currently being sought for a new operation, resulting in the relocation of 136 full-time and part-time jobs from the area. The EIA found that redeveloping the site to a mixed use residential development would have substantial economic benefits, including \$1.4 billion in total economic activity as a result of the development and a net increase in salaries and jobs on the site compared to the base case.

The site is also ideally located along the Parramatta foreshore to provide significant public domain improvements including a foreshore park public open space, pedestrian links along the waterfront, as well as spaces for community facilities to facilitate social interaction.

Given the above, the site represents a significant opportunity for redevelopment as a mixed use residential precinct adjacent to the water.

Whilst the draft district plan sets out broad and high level objectives for development across the district, we believe additional direction and clarity could be provided by identifying how to deal with “opportunity sites” such as this.

2. BACKGROUND

The site has a total land area of 3.9 hectares and consists of the following lots:

- Lot 5 in DP 129325;
- Lot 2, DP230294;
- Lot 398, DP752023; and
- Lot 399, DP752023.

The site is surrounded by residential uses, with a frontage to the foreshore. The site is within an easy 500 m walking distance to Bayview Park Ferry Wharf as shown in **Figure 2** below.



Figure 2 – The site within its local context

The site is also close to the Parramatta Road Urban Transformation Corridor, and the identified growth precincts of Burwood (900 metres) and Kings Bay (1.4 km) as shown in **Figure 3** below.



Figure 3 – The site in the context of the Parramatta Road Urban Transformation Strategy

FreshFood has owned and operated the Bushells factory on the site for the past 18 years following its acquisition of the Bushell's Coffee brand.

However, the continued suitability and appeal of the site for its current coffee-making industrial use is constrained by its:

- location on Parramatta River,
- surrounding residential areas,
- poor heavy vehicle access and
- isolation from other industrial uses and major transport routes.

Moreover, the factory has reached the end of its useful life and an alternative location is currently being sought for a new operation.

To ensure the site does not remain vacant and disused after the closure of the factory, FreshFood are currently preparing a Planning Proposal to rezone the site from its current industrial zoning (IN1) to a mixed use (B4) zoning and amend the built form controls that apply to the site.

Given the site represents one of the last remnant sites of Sydney Harbour's riverside industrial heritage in Canada Bay, the Planning Proposal intends to:

- Celebrate the site's industrial character by meaningful adaptive reuse of the factory building, while still
- Enabling the redevelopment of the site to create a vibrant mix of residential, retail, commercial, and community uses, as well as a high quality public domain and open space throughout the site.

FreshFood have engaged award winning architecture firms BVN and AJ+C to jointly develop a detailed urban design study and an initial architectural concept to underpin the Planning Proposal, ensuring that it is feasible to deliver and provides various public benefits as discussed below.

The concept indicates a significant opportunity on the site for residential and mixed uses in the order of:

- 680 dwellings incorporating a variety of apartment types, sizes and affordability that range from 1 bedroom to 3 bedroom units;
- 3,800 m² of retail and commercial uses;
- 18,900 m² of publicly accessible open spaces (40% of the site area);
- 2,800 m² of community facilities and 650 m² of childcare facility;
- 1,200 car parking spaces for residential, visitor, and other non-residential uses over two to four levels of basement parking;
- New through-street from Burwood Road to Zoeller Street;
- New internal street off Burwood Road providing pedestrian access to the foreshore; and

The concept has been designed to suit the available market and needs of the surrounding area and incorporates a variety of apartment types, size and affordability, while being compliant with the provisions of *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development* (SEPP 65).

The concept positively incorporates the seven principles of urban design as established in NSW Government's draft policy *Better Placed* to ensure that future redevelopment of the site delivers high quality housing, employment uses, community and social infrastructure, and public open spaces.

The Planning Proposal is also supported by technical studies including an Economic Impact Assessment and Retail Demand Assessment by Hill PDA, a Social Infrastructure and Community Uses Demand Assessment by Urbis, and a transport Impact Assessment by GTA consultants.

3. CONSULTATION

After a consultation phase with council and the community, the following points have been raised as the highest priorities for the site:

- Traffic impacts on Burwood Road;
- Reinstatement of the ferry service to Bayview Wharf;
- Provision of cafes and local shops;
- Parkland, open spaces and access to water;
- Density of development; and
- Sustainability

As described in **Section 4** below, the proposed rezoning and subsequent development of the site will address these priority matters and offer significant benefits.

4. BENEFITS OF THE PROPOSAL

The proposed rezoning and subsequent redevelopment will have a range of economic, social, housing, transport, community and sustainability benefits, including:

- **Job creation** - 272 new jobs on the site, compared to only 185 if the site were retained for its existing uses and expanded to maximise potential capacity of its current industrial use.
- **Voluntary Planning Agreement (proposed)** - Comprising the following public benefits:
 - **Affordable housing** - Allocation of 10% of the residential units as affordable housing units, effectively increasing the affordable housing stock within the City of Canada Bay LGA by almost 300%, and positively addressing the existing residential shortfall within Concord and the wider LGA.
 - **Adaptable housing** – 20% of the dwellings to be designed to meet the needs of an ageing population (Silver Level of the Liveable Housing Design Guidelines).
 - **Bus service** - Funding of a community bus loop connection between the site, Burwood Station, and Strathfield Station as part of the VPA to service the residents and visitors to the site for a period of three years.
 - **Ferry service (proposed)** - Undertaking of an agreement with a private operator to operate regular ferry services between Bayview Park Ferry Wharf and Barangaroo immediately following completion of the first residential stage. FreshFood will underwrite this over a period of three years.

These public transport initiatives will substantially improve the connectivity and accessibility of the site, in an area that is already well serviced by local bus routes, railway and ferries as shown in **Figure 4** below.

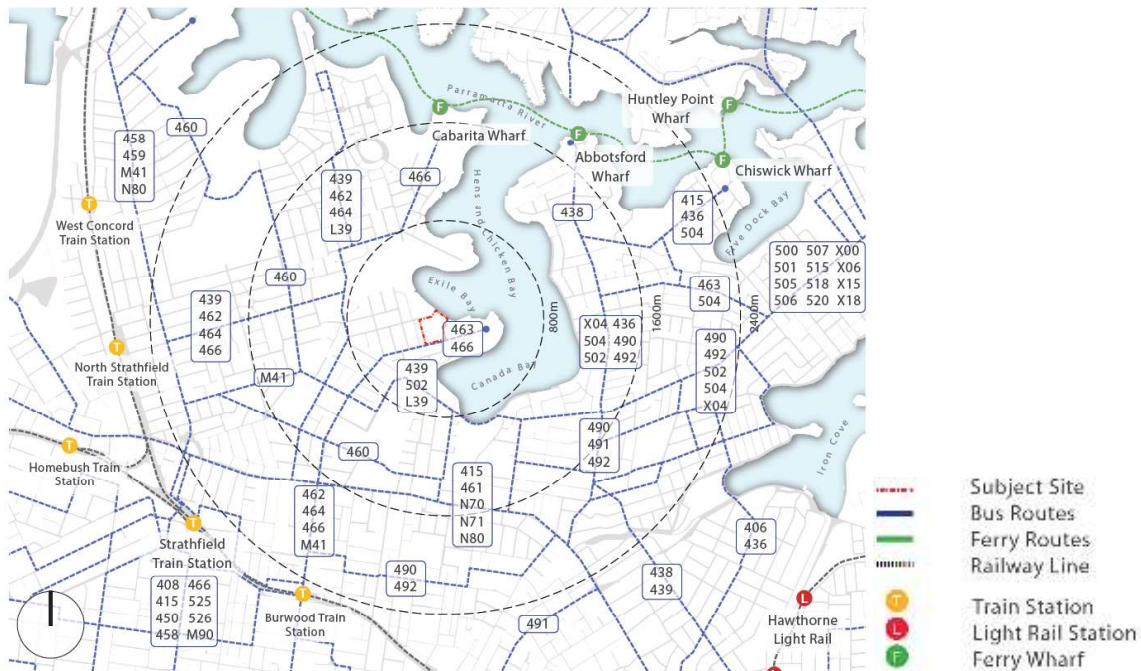


Figure 4 – Surrounding public transport network

- **Community uses** - The community benefits will include cultural infrastructure to be available for community uses, such as performances, events, artists' galleries, exhibitions and recreational facilities.

- **Ecologically Sustainable Development** - The Planning Proposal will also provide the opportunity to incorporate Ecologically Sustainable Development (ESD) measures into the future development on the site, including:
 - Efficient appliances and improved thermal design
 - Solar photovoltaic and battery ready facilities
 - Recycled water ready facilities
 - Green façade treatment for cooler dwellings
 - Best practice parking measures and access to car share facilities

In summary, the proposal will enable the creation of a thriving and successful mixed use development with a distinct sense of place, not available elsewhere in the district or in Sydney, and a unique destination that includes public amenity such as community markets, beach and foreshore access, multipurpose cultural and exhibition spaces, and public plazas.

5. THE DRAFT CENTRAL DISTRICT PLAN

The Draft Central District Plan sets out priorities and actions for the development of the Central District of Greater Sydney, which includes the LGAs of Bayside, Burwood, Canada Bay, Inner West, Randwick, Strathfield, the City of Sydney, Waverly and Woollahra.

The site is located within the City of Canada Bay LGA, and therefore falls within the Central District as shown in **Figure 5** below.

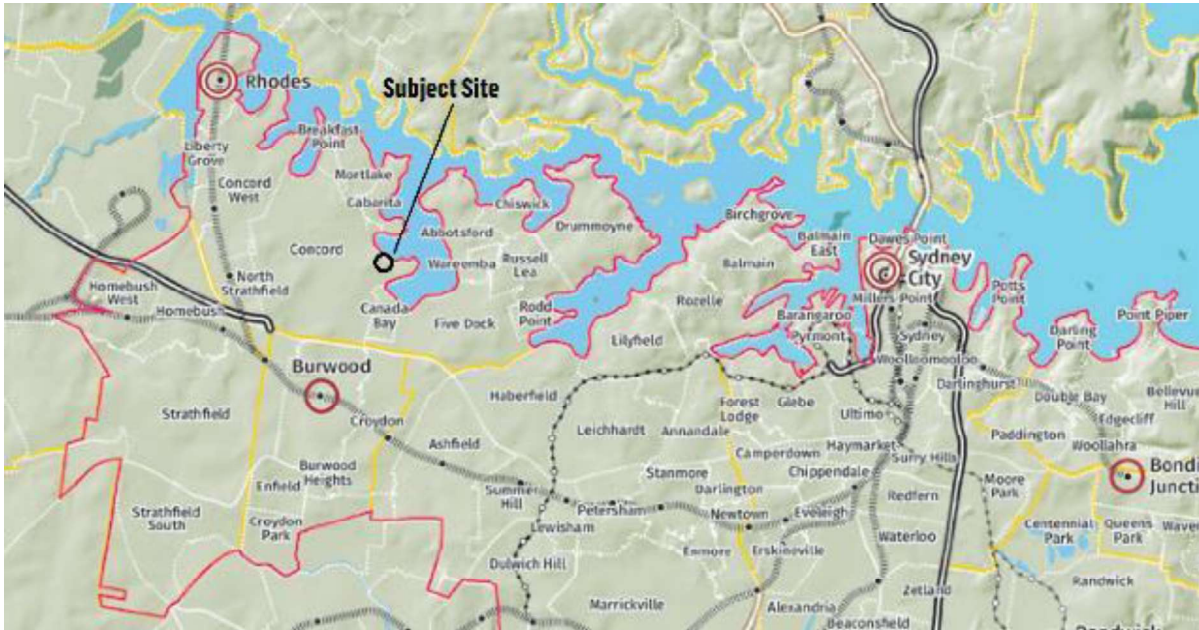


Figure 5 – Location of the site within the Central District

As required by the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, the Central District Plan:

- Provides the basis for strategic planning in the District, having regard to economic, social and environmental matters;
- Establishes planning priorities that are consistent with the objectives, strategies and actions of *A Plan for Growing Sydney*;
- Identifies actions required to achieve the planning priorities.

The draft Central District Plan anticipates a growth of 16,250 more people every year until 2036 for the Central District, and wants to target delivery of +2,600 dwellings in Burwood and +2,150 dwellings in Canada Bay over the next 5 years.

In addition, up to 3,700 new jobs are targeted for the Burwood District Centre by 2036.

Burwood is also identified as a growth precinct, along with the nearby Kings Bay, in the Parramatta Road Urban Transformation Strategy.

As noted previously, Hill PDA found that redeveloping the site from its current end-of-life industrial use to a mixed use residential development would have substantial economic benefits and will positively address the draft District Plan's dwellings and jobs targets, and generate \$1.4 billion in total economic activity and a net increase in salaries and jobs on the site compared to the base case.

Given the central role that this document will play in the strategic planning for the District, we believe it is important that the Central District Plan should clearly facilitate the rezoning of important and strategically located "opportunities" such as the subject site to ensure the delivery of the District actions and priorities.

One of the actions noted by the draft District Plan is for Canada Bay Council to investigate local opportunities to address diversity and demand in the short to medium term at local centres and close to transport. The Planning Proposal will create an opportunity for Council and the proponent to work together to deliver significant public benefits on the site.

As discussed in the sections below, the Planning Proposal will demonstrate a high level of alignment with the productivity, liveability, and sustainability priorities and actions of the draft Central District Plan.

Given the site's:

- unique location along Parramatta River,
- incompatibility with continued industrial uses,
- proximity to Burwood and Kings Bay, and
- capacity to provide substantial community, social, cultural, recreational and open space uses to service the wider catchment of residents and workers,

we submit that the site is ideally suited for redevelopment to contribute to the actions and priorities of the Central District Plan, as well as to the success of future development along the Parramatta Road Corridor.

The key priorities and actions of the Central District Plan are addressed below, summarising our review and interpretation of the plan in relation to the site and its implications for the Planning Proposal, followed by our recommendations to the draft Central District Plan in **Section 5**.

5.1. PRODUCTIVITY

The key productivity priorities and actions relevant to the site are:

- Planning for job target ranges for strategic and district centres – 1,700 -3,700 new jobs in Burwood by 2036
- Growing economic activities in centres – Burwood is identified as a district centre that accommodates retail and local services for communities
- Protect and manage employment and urban services land – major employment and urban services precincts are identified in Bayside, Inner West, Randwick, Strathfield and City of Sydney
- Improving 30-minute access to jobs and services – enhancing access to a broader range of jobs and services within 30 minutes, with new housing to be focussed on transport corridors and around employment centres to increase the proportion of people living within easy access of jobs and services
- Develop better understanding of the value and operation of employment and urban services land –by researching into how these areas operate, the range of uses they support, their industry and supply chains, their interdependencies, key constraints and opportunities. This will help identify the characteristics and value-add of these locations to inform preparation of appropriate planning controls to protect, support and enhance the economic function of these areas.

The Planning Proposal will align with the productivity priorities and actions because:

- It will contribute to a net increase in jobs on the site, with an increased proportion of residents living close to employment, retail facilities, amenities and public transport. The proposal would result in 272 new jobs on the site, compared to only 185 if the site were retained for its existing uses and expanded to maximise potential capacity of its current industrial use.
- It will support the growth of the Burwood district centre by increasing residential densities on the site with access to jobs and services at Burwood;
- The community bus loop will ensure that workers and visitors can easily access the site from the key transport nodes at Burwood and Strathfield.

- The Ferry service to Barangaroo will provide a 30-minute commute option to locations along Parramatta River and Sydney Harbour for future residents on the site and surrounding lands;
- The Planning Proposal involves the rezoning of industrial land to a mixed zoning to enable residential, retail, commercial and community uses as well as public open spaces. The draft Central District Plan notes that the Commission's priority is to take a precautionary approach to the conversion of employment and urban services lands in the absence of a District wide assessment of their value and objectives. Refer to **Section 5** for further discussion.

5.2. LIVEABILITY

The key liveability priorities and actions relevant to the site are:

- Improving housing choice, diversity and affordability – by supporting delivery, capacity, diversity and adaptability, affordability and social housing
- Deliver Central District's five-year housing targets – based on the district's dwelling need and opportunity to deliver, 5-year housing targets of +2,600 dwellings in Burwood and +2,150 dwellings in Canada Bay have been identified
- Implement the Affordable Rental Housing Target and undertake broad approaches to facilitate affordable housing - A target of 5% to 10% of new floor space to be applied at the rezoning stage
- Canada Bay Council to investigate local opportunities to address diversity and demand in the short to medium term at local centres and close to transport.
- Creating great places – through design-led planning and supporting high quality urban design
- Fostering cohesive communities
- Identify opportunities and create the capacity to deliver 20-year strategic housing supply targets – to be achieved through urban renewal, medium density infill development and new communities in land release areas
- Conserve and enhance environmental heritage including Aboriginal, European and natural
- Facilitate enhanced walking and cycling connections
- Foster the creative arts and culture
- Support planning for shared spaces
- Responding to people's need for services

The Planning Proposal will align with the liveability priorities and actions because:

- It will improve housing choice, diversity and affordability by providing 10% (approximately 68) as affordable housing units and 20% as adaptable dwellings on the subject site;
- It will enable the Central District in achieving its five-year housing targets by incorporating 683 dwellings featuring a variety of apartment types and size that range from 1 bedroom to 3 bedroom units.
- It will create an opportunity for Council and the proponent to work together to deliver significant public benefits including a foreshore public open space and pedestrian links along the waterfront.
- It will enable the development of a well-design development with high quality urban design because the proposed scheme has been developed based on thorough and detailed urban design and heritage analysis.

- It will enable the creation of a unique sense of place, not available elsewhere in the district or in Sydney, and include public amenity such as community markets, beach and foreshore access, multipurpose cultural and exhibition spaces, and public plazas that will foster cohesive communities.
- The Planning Proposal will enable the provision of unique Social infrastructure on the site, including Community market, Multipurpose cultural and exhibitions spaces, Public open spaces, Childcare centre (90 places).
- It will create a local centre providing retail, commercial and community services with capacity to support the residential uses on the site and on the surrounding sites, while improving walking and cycling connections through the site.

5.3. SUSTAINABILITY

The key sustainability priorities and actions relevant to the site are:

- Enhancing the central district in its landscape – supported by healthy waterways, areas of native vegetation, and Sydney’s Green Grid of parks and open space
- Protecting the District’s waterways – protecting and managing access to the Sydney Harbour foreshore as a place for cultural events and celebrations, tourism, recreation around its foreshores, ferries and recreational watercraft.
- Delivering Sydney’s green grid – a highly connected and diverse network of open spaces, public areas and green spaces, with improved access to sport and recreation facilities.
- Planning for an efficient and resilient central district
- Incorporate the mitigation of the urban heat island effect into planning for urban renewal project and priority growth areas

The Planning Proposal will align with the sustainability priorities and actions because:

- It will preserve significant vegetation on the site, provide new landscape and tree planting to mitigate the urban heat island effect, and provide a foreshore beach and public open space connecting the site back to the foreshore.
- It will introduce a ferry service from Bayview Park Ferry Wharf to Barangaroo, enhancing the use of the Parramatta River and Sydney Harbour as a public transport link for the residents of the site and surrounding areas.
- It will contribute to the Green Grid by enhancing the foreshore walkway providing connections to the ‘Rhodes and Concord Open Space and Hospital Precincts’ and ‘Hen and Chicken Bay Foreshore’, which have been identified as important projects to deliver Sydney’s Green Grid in the Central District.
- It will enable improvements to the foreshore land at the site’s northern boundary, with opportunities to improve the water quality and marine ecosystem within Exile Bay, and incorporate several ESD measures to the future developments on the site to ensure it remains resilient to changing weather patterns and climate.

6. RECOMMENDATIONS TO THE DISTRICT PLAN

We believe it is important that the Central District Plan should clearly facilitate the rezoning of important and strategically located lands. We offer the following recommendations to the draft Central District Plan to enable sites such as the subject site to be redeveloped to ensure the delivery of the benefits as described in **Section 4**.

6.1. EMPLOYMENT AND URBAN SERVICES LAND

The District Plan highlights the challenge of industrial land being rezoned for non-employment uses, and states the aim to 'protect and support employment'.

While we recognise the importance of and need for urban services land to be situated on industrially zoned land, we submit that the District Plan should recognise the specific circumstances of sites such as the subject site which are inherently ill-suited to industrial uses.

The Economic Impact Assessment undertaken by Hill PDA found that, with the exception of activity around Port Botany, the Central Subregion industrial market (within which the subject site is located) is characterised by low levels of demand and new lease activity. This low demand for traditional industrial uses has resulted in the development of alternative uses within the industrial areas such as hardware retailing, showrooms and self-storage facilities rather than manufacturing and urban support services.

The study concludes that, given the site's location on the Parramatta River, surrounded by residential uses, with poor heavy vehicle access, and isolated from other industrial uses and major transport routes, the continued suitability and appeal as an industrial site is constrained.

Two economic scenarios for the site were investigated as part of the Economic Impact Assessment for the future of the site. These scenarios were:

- Maintain the site under its existing industrial use, expanding the operations to maximise the potential floorspace (and employment); and
- The Planning Proposal for medium to high density housing and mixed use development.

The EIA found that changing the composition of use of the subject site from industrial to predominantly residential under the Planning Proposal scenario would contribute to economic benefits relating to:

- A net increase in jobs and salaries – Planning Proposal would result in 272 jobs on the subject site, compared to 185 jobs onsite if the site were retained for its existing uses and expanded to maximise potential capacity.
- Additional economic activity during the period of construction, stimulating investment in the locality;
- Increased proportion of residents living close to employment, retail facilities, amenities and public transport;
- Provision of housing close to education and recreational facilities; and
- Improved viability of the main retail and commercial precincts

6.2. SITE AS A LOCAL CENTRE

Burwood has been identified as a District Centre with an estimated 10,300 jobs in 2016, with a mix of commercial, residential, and retail development with a vibrant night time economy based around its restaurants and other entertainment venues. The District Centre is developed around the train station with the main retail strip anchored by Westfield and Burwood Plaza.

Burwood is characterised by a large retail catchment, and is targeted to have 3,700 new jobs by 2036.

The Planning Proposal will support the continued growth of jobs and retail in Burwood because it will enable the redevelopment of a site that is within 2.2 km of the Burwood Town Centre, and provide a community bus loop connection between the site and Burwood Station/Strathfield Station.

The community bus loop will ensure that workers and visitors can easily access the site from the key transport nodes at Burwood and Strathfield.

The Retail Demand Assessment (RDA) undertaken by Hill PDA found that a convenience retail centre of approximately 2,500 m² is appropriate for the subject site, with the site providing a unique opportunity to combine a heritage significant industrial character with waterfront amenity to provide a successful local centre.

Based on analysing the above case studies, and an assessment of future expenditure from workers on the site and from visitors to the site, the Retail Demand Assessment concludes that the planning of retail space should capitalise the double frontage of the site (Burwood Road on the southern boundary, and Zoeller Street and Exile Bay at the northern boundary), and provides the following recommendations:

- Convenience retail should address the southern boundary and entrance being the main entrance and the most convenient for residents in the walkable catchment;
- Themed retail should utilise the heritage features on the site but could also capitalise on the waterfront amenity (e.g. themed restaurants); and
- The site could support a Local Centre of approximately 3,500 m² providing a combination of 2,500 m² of convenience retail for local residents, and 1,000 m² to 1,500 m² of themed retail and services including restaurants and the like with heritage and waterfront themes.

The draft Central District Plan defines Local Centres as centres that vary in size from a few shops on a corner to a vibrant main street. They are on a smaller scale than district centres and generally serve the local population. As shown in **Figure 6**, the draft plan currently identifies Breakfast Point, North Strathfield, Five Dock, and Concord as local centres at similar distances from Burwood as the site.

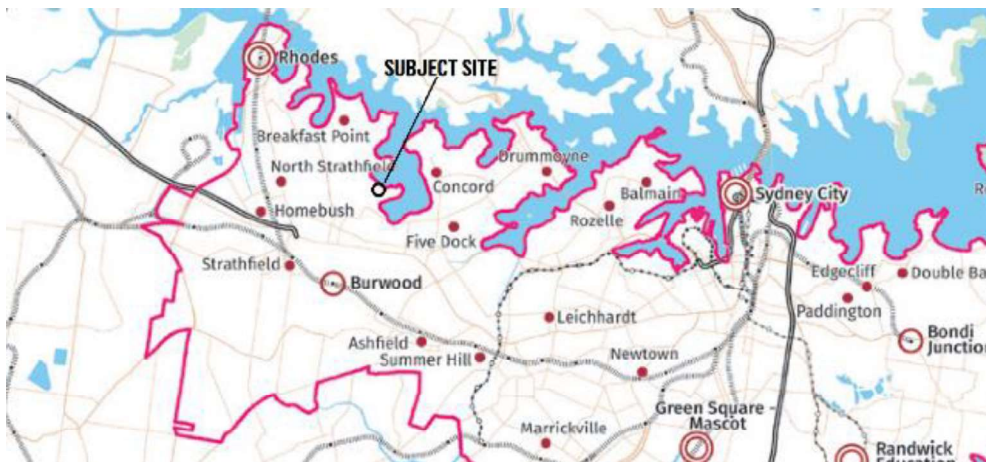


Figure 4 – the Site, the surrounding Local Centres, and Burwood District Centre

The Planning Proposal will provide a unique opportunity for the creation of a vibrant local centre with a mix of retail, commercial, community and recreational uses to service the local population, including residents of the site.

6.3. 30-MINUTE ACCESS TO JOBS AND SERVICES - FERRY

While the draft Central District Plan notes that ferries are an important part of the District's public transport network, it does not provide any actions or priorities that focus on integrating and improving ferry services as part of the wider public transport network within the Central District.

We believe that ferry services along Parramatta River should play a bigger role in the east-west connection within the District. This will be especially crucial to mitigate the short-to-medium term transport pressures that will be experienced along the main east-west transport corridors of the District when infrastructure projects such as WestConnex and Metro West begin construction.

The increased residential densities on the site because of the Planning Proposal, complemented by the future development in Burwood create opportunities to reinstate the ferry service from the Bayview Park Ferry Wharf.

To this end, the proponent has proposed to enter into a deed with a private operator to operate 14 ferry services daily between Bayview Park Ferry Wharf and Barangaroo immediately following completion of the first residential stage. FreshFood has agreed to underwrite the service over three years.

This ferry service would tie in with the already committed investment in transport infrastructure such as the ferry hub at Barangaroo, and align with the draft Central District productivity priority of improving 30-minute access to jobs and services.

This initiative will also align with the aim of the NSW Long Term Transport Master Plan, which is to plan for long term ferry service improvement to match population and travel growth.

7. CONCLUSION

As discussed, the planning proposal represents a unique opportunity to redevelop a key site along the Parramatta River corridor that has reached the end of its useful life as an industrial facility.

The District Plan should recognise the specific circumstances of such sites which are inherently ill-suited to industrial uses, and should enable mechanisms for rezoning them to mixed uses

This submission has reviewed the draft Central District Plan in relation to the site at 160 Burwood Road, Concord and makes three recommendations to be considered by the Commission when finalising the District Plan:

1. We recommend that the Central District Plan incorporate a Productivity Action for the Commission to ***'identify isolated industrial sites that are strategically located and support the redevelopment of these sites for alternate uses'***.
2. Given the conclusions of the Retail Demand Assessment, and the enhanced public transport connection provided by the community bus loop, and to take advantage of the unique place making opportunities the site offers, **we recommend that the Central District Plan identify the site as a local centre.**
3. To reflect the potential of the Parramatta River corridor to improve public transport connections and as an alternative to road transport, we recommend that the Central District Plan incorporate a Productivity Action for the Commission to ***"encourage opportunities to integrate transport modes such as ferries and buses in relation to urban renewal sites along river corridors"***

Should you have any questions regarding this submission, please contact me [REDACTED]

Yours sincerely,



Peter Strudwick
Director