

9 November 2017

Paul Hickey  
General Manager  
Ballina Shire Council  
40 Cherry Street  
Ballina NSW 2478



Dear Paul

### Planning Proposal Request: – Skennars Head

I act on behalf of the Applicant, Intrapac Skennars Head Pty Ltd (Intrapac)

I refer to Council's letter dated 27 October 2017 outlining Ballina Shire Council's resolution of 26 October 2017. I apologise for the delay in replying.

Intrapac had hoped that Council would have seen the full merit and supported the Planning Proposal in its entirety. Intrapac are however grateful that the Council supported the relocation of the B1 Neighbourhood Centre Zone on the site of an area up to 13,000sqm, subject to further information being received.

As per our email correspondence with Simon Scott, Strategy Planner, we are not fully clear what the "required information" (as per Council's decision) consists of, and for this reason we attached a copy of the handout provided to Councillors (**Annexure A**) as well as provide further information in this letter, and as outlined below.

#### Other Retail centres

In justifying the proposed size of the B1 lot, it is critical to consider other retail areas in Ballina. Please see attached in **Annexure B** other retail centres within the area. Commercial precincts recently approved in other land subdivisions include at Ballina Heights at Cumbalum with 70,000m<sup>2</sup> and Epiq at Lennox Head with 40,000m<sup>2</sup> of land area.

This plan demonstrates that the proposed B1 at Skennars Head would fill a current vacuum of local retail needs.

This is confirmed by MacroPlan who indicate that a neighbourhood centre of around 3,000 sqm could be supported at the subject site, incorporating an 1,100 sqm supermarket, around 1,000 sq.m of retail specialties and 900 sqm of non-retail uses. In addition to the retail/non-retail GLA, there are a number of other uses that need to be accommodated within the centre including loading docks/areas, amenities, internal walkways/malls/open areas, seating areas, centre management office, electrical switchroom/fire panel/cleaners, etc. Assuming a 90% GFA to GLA efficiency ratio, and a Floor Space Ratio (FSR) of around 0.3, it results in a site area of around 11,000 - 12,000 sqm. The retail centre is proposed to be located on a land area of 13,000 sqm.

MacroPlan's report submitted with the rezoning also identified a number of comparable small neighbourhood centres to contextualise the centre composition proposed at the subject site. These centres ranged from around 2,450 – 4,000 sqm of total floorspace (including retail and non-retail uses) and averaged 3,178 sqm total floorspace, which is in-line with the proposed development.

Further MacroPlan have considered the land/lot area of these centres as outlined in the table below.

**Table 1      Comparable small neighbourhood centres and land area**

Skennars Head - Comparable small neighbourhood centre size and land/lot area					
Centre	Retail GLA (sq.m)	Non-retail GLA (sq.m)	Total GLA (sq.m)	Land/Lot Area (sq.m)	Comments
Breakfast Point Village	2,545	600	3,145	8,212	Limited parking provision (high density)
Ropes Crossing Village	3,374	24	3,398	12,323	Traditional suburban neighbourhood centre
Wadalba Centre	2,250	750	3,000	10,141	Traditional suburban neighbourhood centre
Crace Central	2,075	375	2,450	6,554	Limited car parking provision
Casuarina Village	3,600	400	4,000	16,467	Traditional suburban neighbourhood centre
Salt Village	1,700	900	2,600	13,369	Part of hotel complex, includes retail/ car park
Crestwood Plaza	<u>2,890</u>	<u>760</u>	<u>3,650</u>	<u>12,160</u>	Includes undercroft and on-grade parking
<b>Average</b>	<b>2,633</b>	<b>544</b>	<b>3,178</b>	<b>11,318</b>	
Skennars Head (prop.)	2,100	900	3,000	13,000	

Source: Property Council of Australia; MacroPlan Dimasi

On average the land area required for similar centres of c.3,000 sq.m is around 11,000 – 12,000 sq.m. This includes a number of examples that provide a non-standard 'suburban neighbourhood centre' (i.e. retail centre with at-grade car park) such as Breakfast Point Village which provides a very limited provision of car parking in a high density/in-fill development area; Crace Central which provides a small provision of car parking limited to on-street parking only; and Crestwood Plaza which includes at-grade as well as under-croft parking. The above analysis indicates a minimum land area of around 11,000 -12,000 sq.m, where the proposed 13,000 sq.m land area would allow a centre scheme to be developed at the subject site without including well landscape areas, non-convoluted car parking, etc.; and also allows flexibility for potential additional uses in the future (if supported by market demand).

### **Retail centre that can provide some flexibility to develop**

The Intrapac Proposal will service the Skennars Head precinct, consisting of Ballina Palms, Vision Estate, Headlands Estate, North Angels Beach Estate, Sharpes Beach; and Southern Lennox Head.

The East Ballina Commercial Precinct, as a comparable commercial precinct, being 8,000m<sup>2</sup> includes the following limitations: -

- » The childcare centre, to be viable, has to lease additional land holdings off the Council;
- » When the childcare centre was approved, an easement was required over the adjoining site to provide adequate car parking spaces and manoeuvring area (approximately 15 spaces);
- » The only café/restaurant in this precinct is currently looking at expanding their outdoor dining onto Council owned Community land;
- » The owners, staff and overflow customer parking are accommodated in on-street Council car parks across the road, approximately 30 carparks.
- » At certain times of the day, this shopping centre has major congestion issues and locals drive past to go Ballina Central or Ballina Fair.

The proposed Skennars Head Village Commercial Precinct will require significant outdoor alfresco dining space. This can either be dealt with now, or the tenants at some stage in the future, will approach Council to lease community zoned land from Council. This has the potential to raise issues with land management. This is included within the Intrapac Proposal of 13,000m<sup>2</sup>.



### **Sufficient land size to accommodate public realm, landscaping and good circulation**

Attached is a short visual document (**Annexure C**) outlining the indicative concept for the site and the sites' relationship of built form to public realm. The report also indicates that if the size of the lot is decreased to 8,000sqm then it would result in:-

- » retail uses, with no other uses able to fit/be accommodated
- » layout that is not able to accommodate built form sleeving carpark
- » sea of car parking
- » more conflict between pedestrians and vehicles
- » less public domain and landscaping
- » significant interface issues with the lot south due to loading access, vehicular movement and views.
- » Worse visual impact from The Coast Road as more car parking will be seen.
- » The proposed breakdown of ground floor space is as follows:
  - Open space / public- 39%
  - Retail – 37%
  - Residential - 9%
  - Parking – 14% (remained of the parking is undercroft parking)

### **Conclusion**

Thank you for the opportunity to provide the additional information.

On the basis of the Council recommendation, and the information contained herein, we do not propose to make any further updates to any documentation submitted to Council. We would propose that the Planning Proposal be considered by Council and forwarded to the Gateway. Post Gateway we can make any amendments to the Planning Proposal as well as provide mapping data to Council. This approach allows Intrapac to obtain more certainty on the rezoning moving forward.

We would be happy to undertake a further presentation to Council on the rezoning application.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Jenny Rudolph  
Director  
[jenny@elton.com.au](mailto:jenny@elton.com.au)



# Annexure A – Justifying 13,000sqm for the B1 Zone handout

# **Item 9.6. - Skennars Head**

## **Proposed Rezoning – B1 and R3**

26 October\_\_\_\_\_  
2017

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Presentation to Ballina Shire Council

# Proposed Rezoning

- Councillors, our key request is that you adopt Option 2 in the Council report. This will allow Intrapac to implement the vision for the site.
- Alternatively, we recommend you approve an amendment to Option 3, namely:
- *Application of R3 to part of the site*
- Relocation of the B1 Neighbourhood Centre zone on the site and its expansion of its area up to 13,000sqm.



# Rezoning application

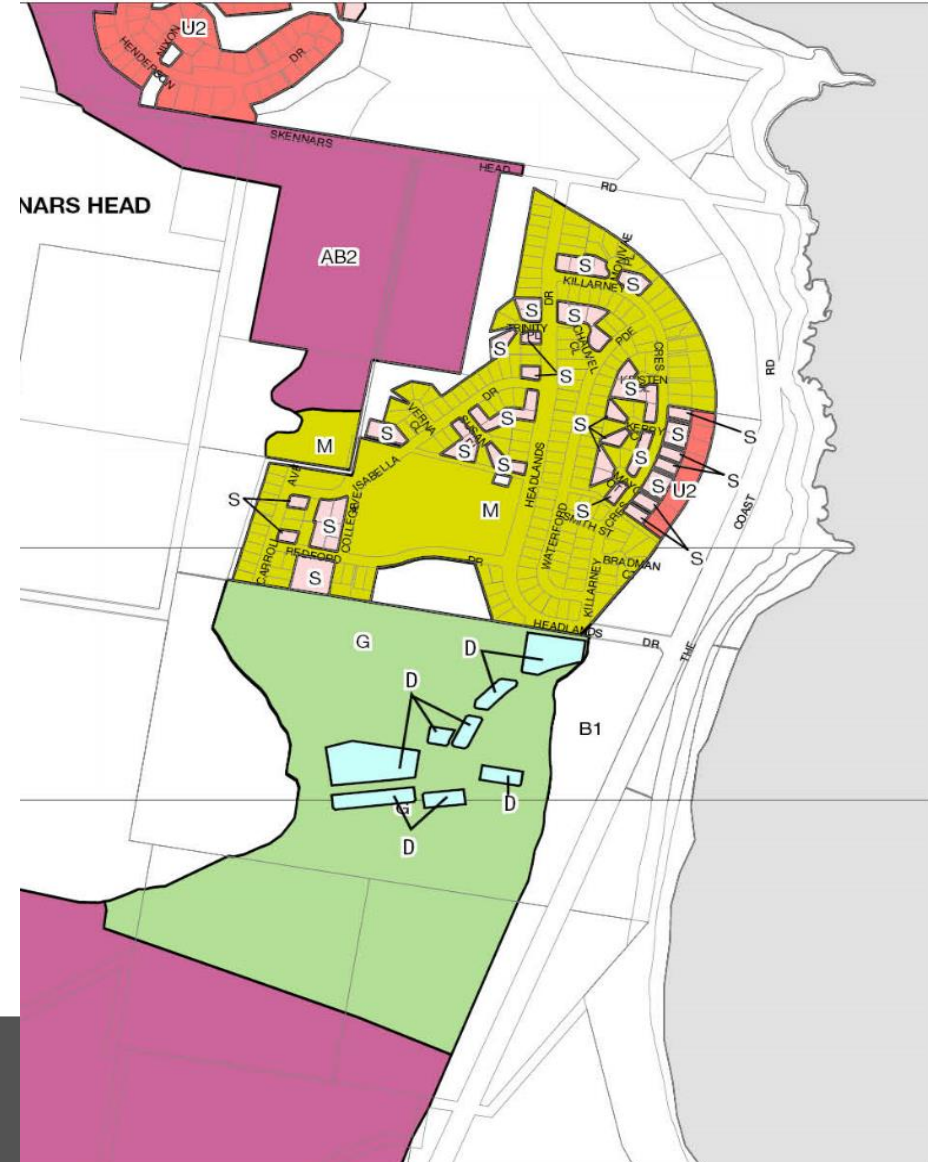
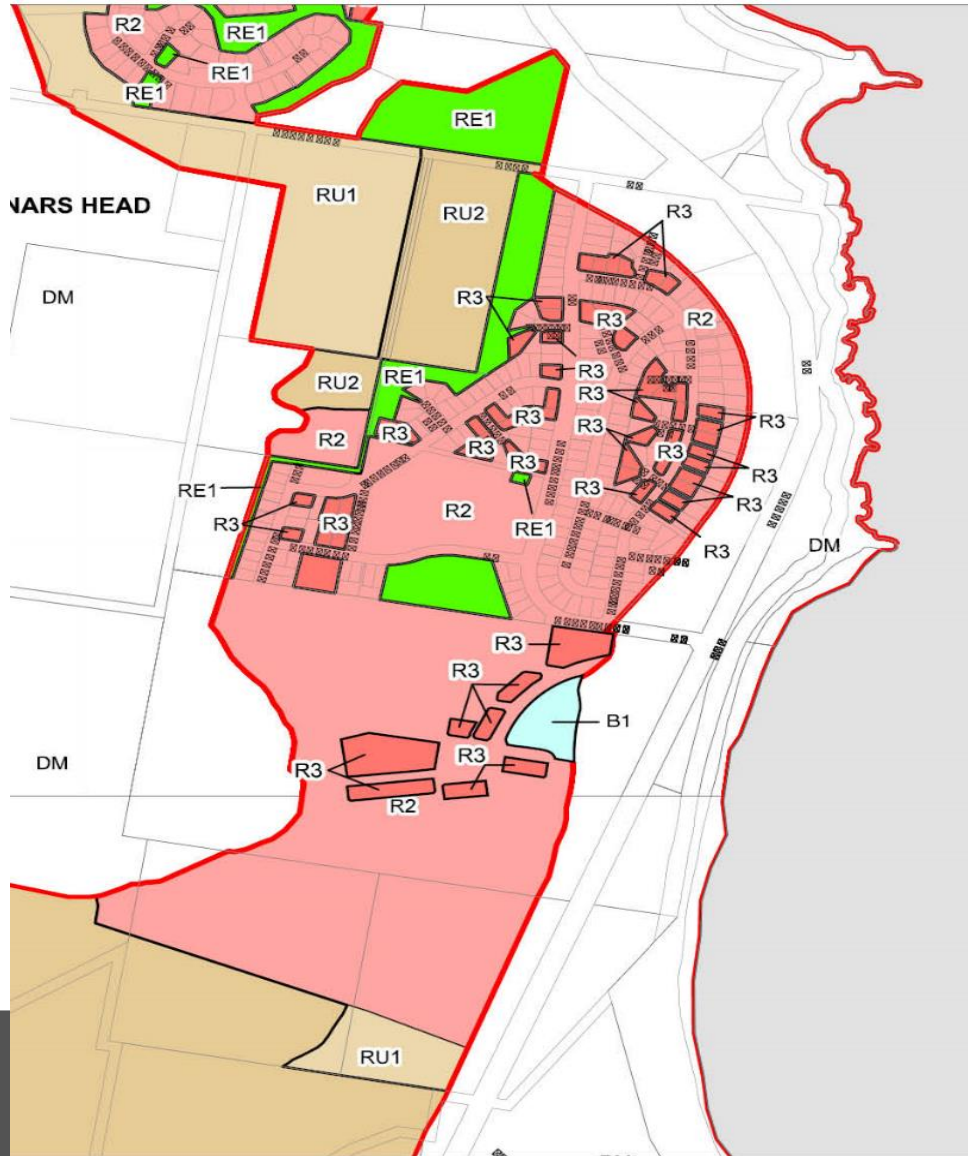


**Relocation of B1 Neighbourhood  
centre**

**R3 for housing diversity and smaller  
lots**

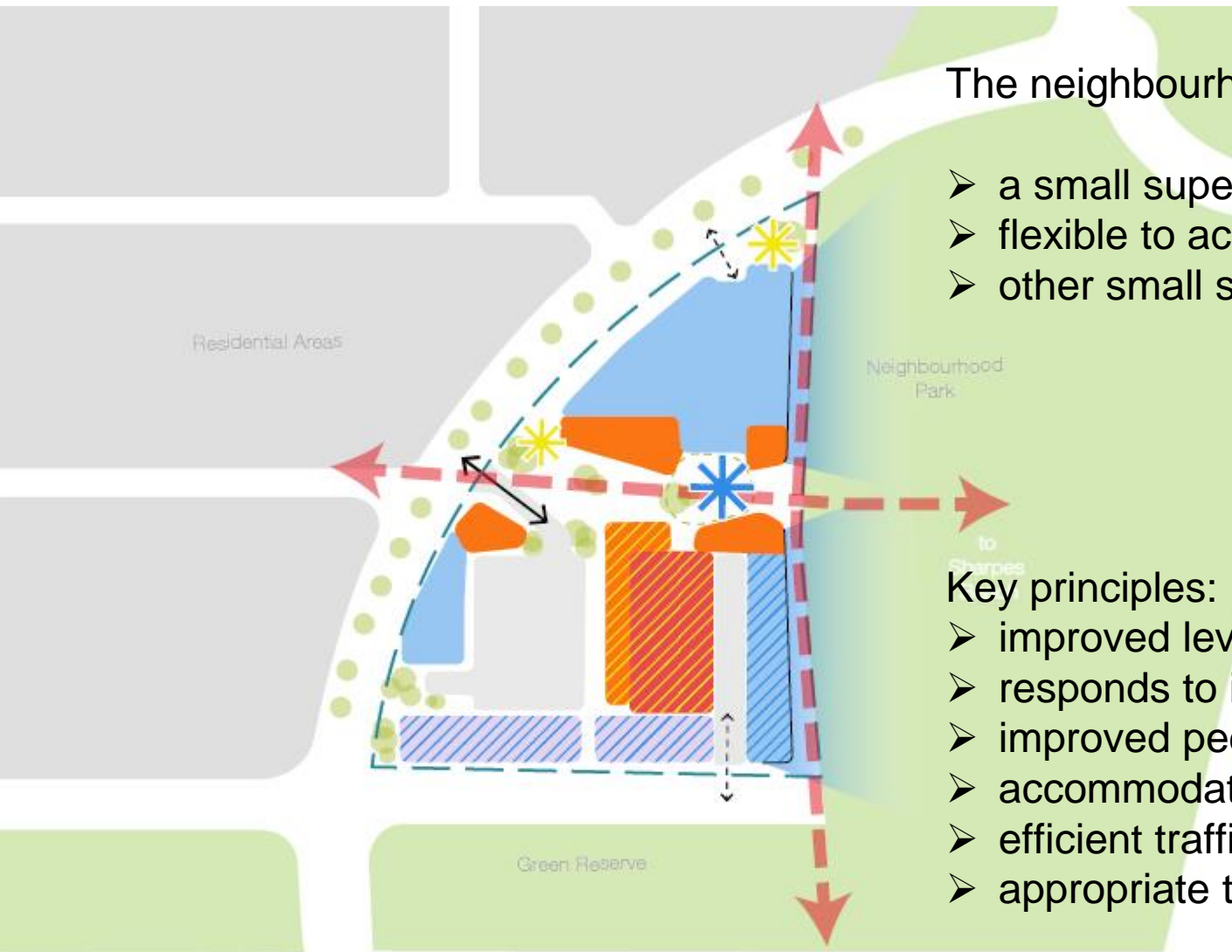


# Rezoning application (cont)





# Rezoning application (cont)



The neighbourhood centre can include:

- a small supermarket and speciality retail
- flexible to accommodate a child care centre or gym
- other small scale local businesses.

Key principles:

- improved level of local services
- responds to its natural environment
- improved pedestrian linkage
- accommodate its parking on its own lot
- efficient traffic movement and parking
- appropriate topography



## B1 Neighbourhood centre will:

- Service Skennars Head precinct including – Ballina Palms, Vision Estate, Headlands Estate, North Angels Beach, Sharpes Beach and southern Lennox Head.
- Be comparable to East Ballina Commercial precinct but there are difficulties with this centre which demonstrates the site is too small.
- Deal with outdoor alfresco, leasing areas now, so the tenants do not need to apply to Council in future and have a complicated land management arrangement
- MacroPlan have stated that the land area required for similar centres of c.3,000 sq.m is around 11,000 – 12,000 sq.m. This includes a number of examples that provide a standard 'suburban neighbourhood centre' (i.e. retail centre with at-grade car park) or no standard which includes at-grade as well as under-croft parking.
- The MacroPlan analysis indicates the site at 13,000sqm can be developed without comprise including well landscape areas, non-convoluted car parking, etc., and also allows flexibility for potential additional uses in the future

# Why we need 13,000sqm?

## 01 Building Size and Layout (Retail Buildings)

### Mixed Use Concept (13,000m<sup>2</sup> Site)

#### Scope and flexibility

- Retail use is accommodated to frame and create a town centre
- Scope/area to provide buildings for other uses, activating the centre
- Layout is able to accommodate built form sleeving carpark



### Retail Only Concept (8,000m<sup>2</sup> Site)

#### Inflexible layout options

- Retail uses are centralised with blank carpark space surrounding
- 8,000m<sup>2</sup> site only allows space for retail uses, with no other uses able to fit/be accommodated
- Layout is not able to accommodate built form sleeving carpark



## 02 Parking Space

Mixed Use Concept (13,000m<sup>2</sup> Site)

### Discreet and integrated

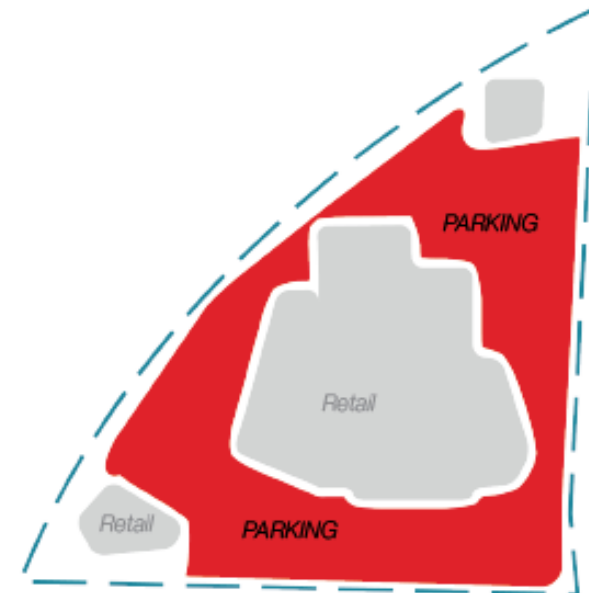
- Parking is integrated within and sleeved by built form, and tucked in undercroft areas
- Design of car parking areas can be more walkable, compact and aesthetically pleasing
- Separation of vehicle and pedestrian space enables safety for users



Retail Only Concept (8,000m<sup>2</sup> Site)

### Sprawling and visible

- Parking layout is confined to surrounding the retail centre to meet statutory requirements
- Sprawling car parking areas are visible from all directions, aesthetically and functionally displeasing
- Pedestrian and car spaces overlap, creating hazards

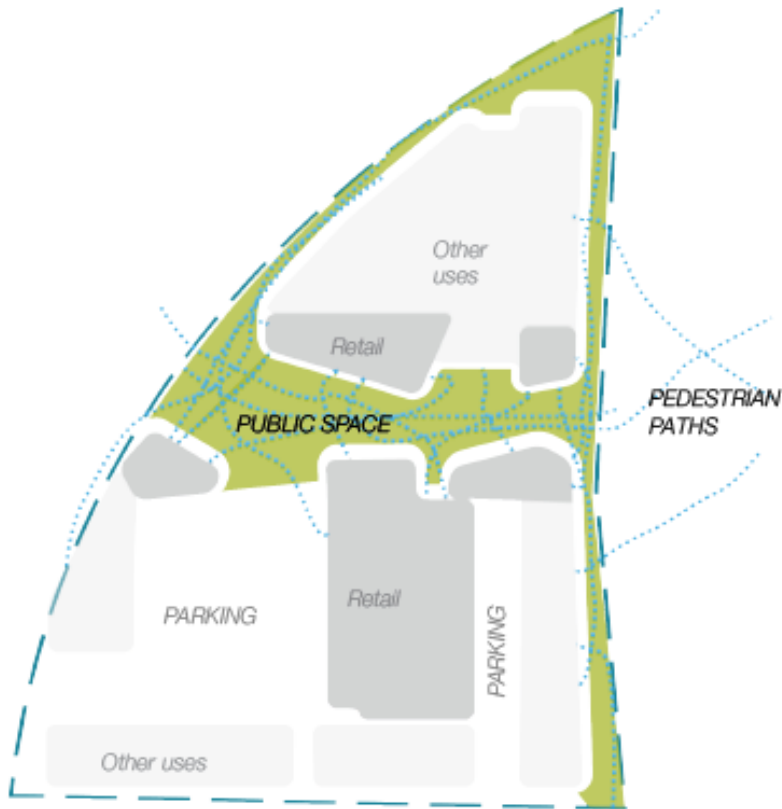




# 03 Public Space and Walkability

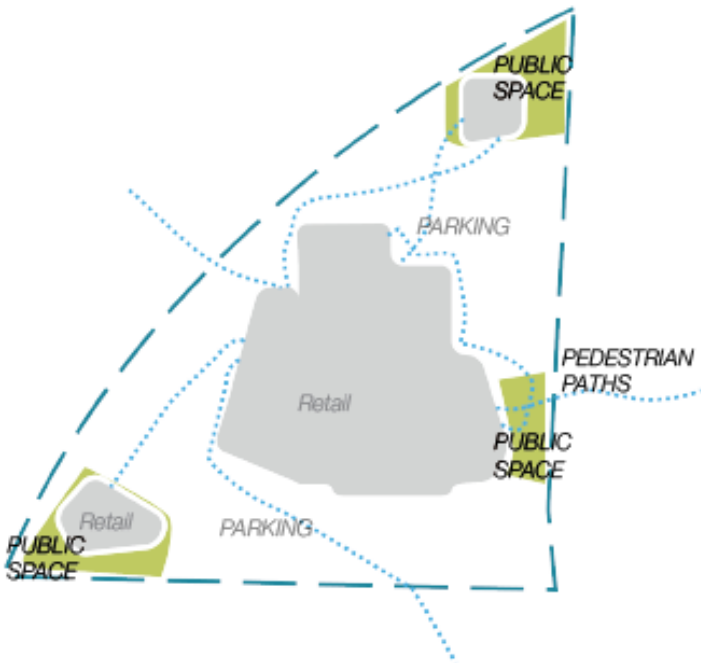
## Mixed Use Concept (13,000m2 Site) Central, connected synergies

- Public space forms spines connecting east-west and north-south
- Walking paths between buildings creates an activated, bustling town centre
- Public space and a safe, attractive walkable environment is paramount to design concept



## Retail Only Concept (8,000m2 Site) Disconnected pockets across car park

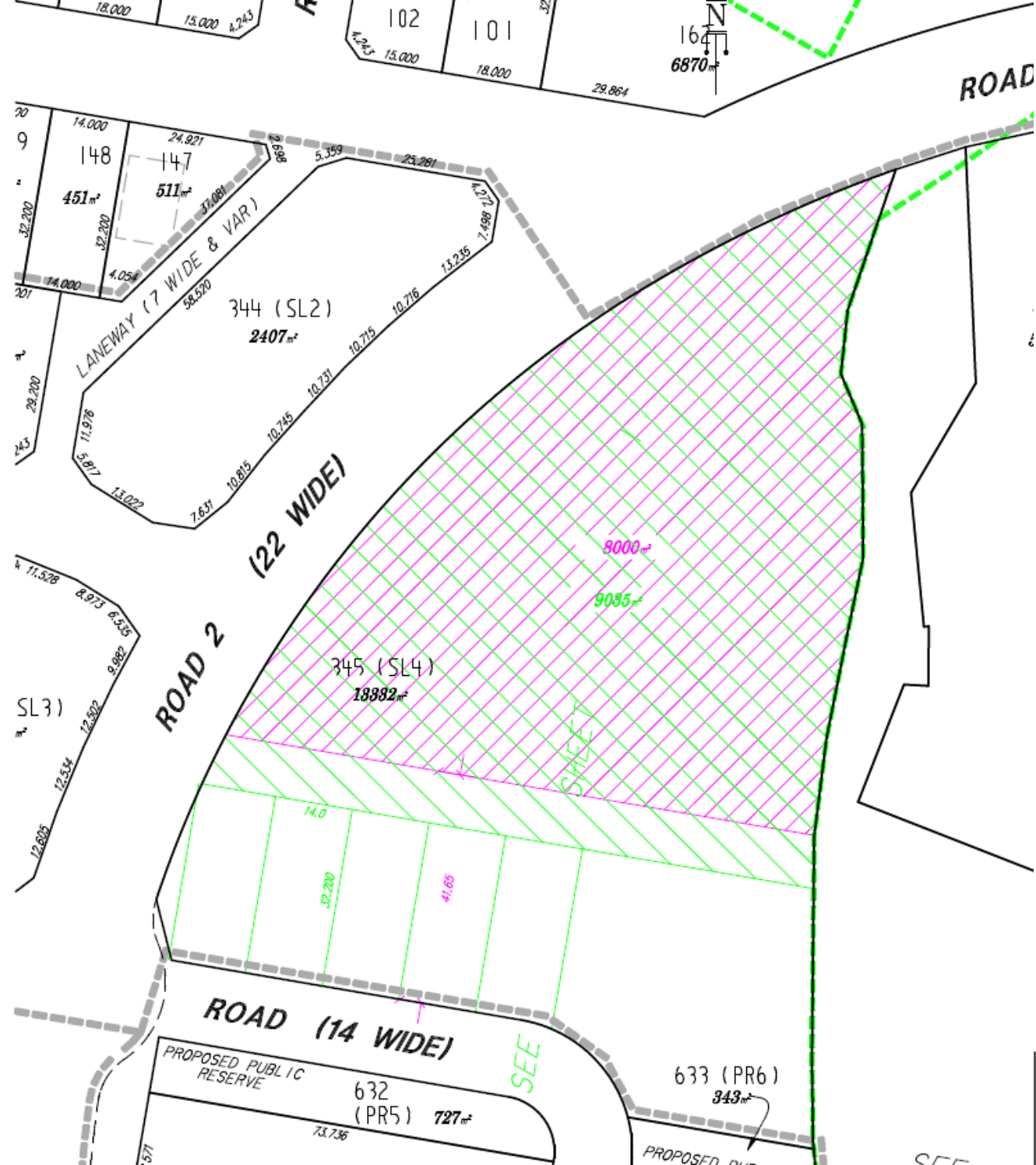
- Public space is forced outwards to fringes of site, disconnected from each other and major pedestrian movements
- Walking paths between buildings are over car park spaces, and don't encourage walking
- Car parking has been prioritised over pedestrian safety and walkability



# An 8000sqm site impacts the southern land

An example of the impact:-

- Impacts the truck and loading
- Creates non usable land and inefficiencies
- Impacts the public realm and promenade



# Conclusion

- Two architects have been commissioned to sensitively design the concept
- Mayor has suggested that Sharpes beach will become the centre piece and we can provide a landmark neighbourhood centre
- No previous comments from Council that the B1 Neighbourhood centre should be reduced
- Request Council support our recommendation.

**Thank you,**

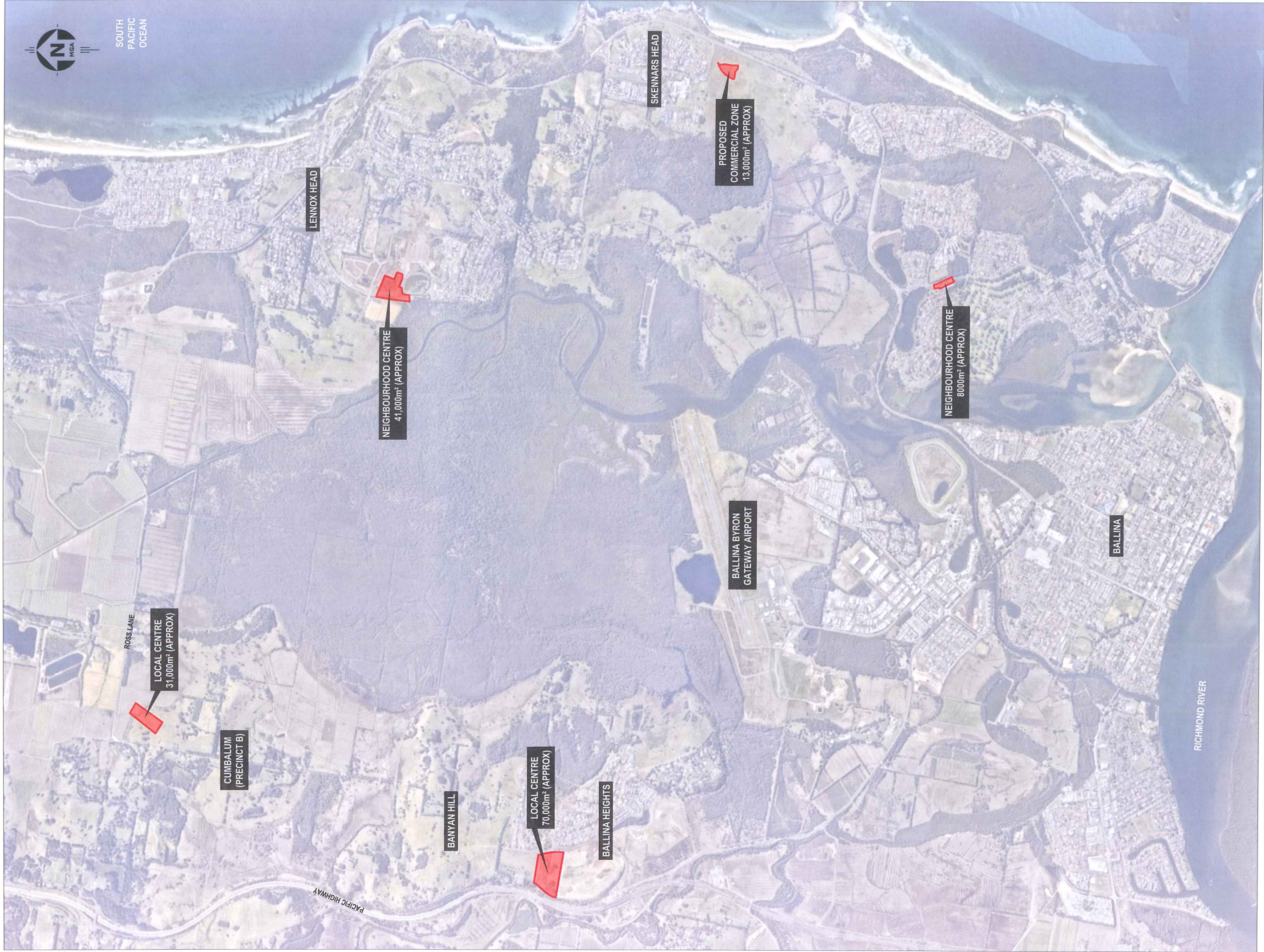
**Questions?**





## Annexure B – Location of retail centres





0 600m



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M: 0414 217 664  
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[www.nrls.com.au](http://www.nrls.com.au)



SCALE: 1:30,000 (A3)  
SURVEYOR: APH  
DRAWN: azacAD  
DATE: 25th OCT '17  
CAD REF: 16037-07

CLIENT: INTRAPAC  
LGA: BALLINA  
SOURCE: AERIAL: NEARMAP

# PLAN ILLUSTRATING EXISTING AND PROPOSED COMMERCIAL ZONES BALLINA, BALLINA HEIGHTS, CUMBALUM, SKENNARS HEAD, LENNOX HEAD

(THIS PLAN MAY NOT BE THE LATEST ISSUE)

ISSUE: A





## Annexure C – Indicative spatial layout and public realm



## **Skennars Head Neighbourhood Centre**

### Urban Design Comparisons

### LEP Amendment Request

### **October 2017**

The following diagrams illustrate constraints on the layout and mix of buildings, and the differing priorities between pedestrian and car parking spaces that a reduction in area of the neighbourhood centre would necessitate, when compared with the proposed amendment request.



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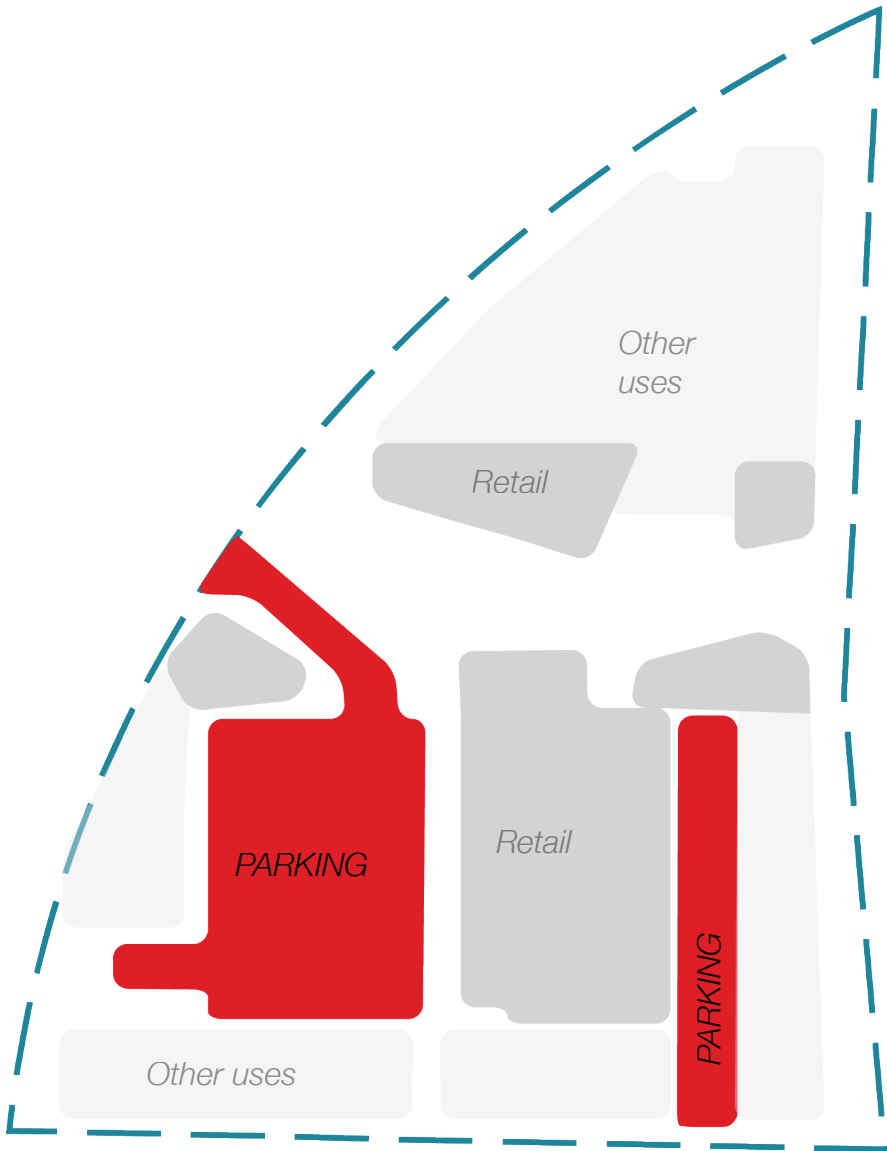
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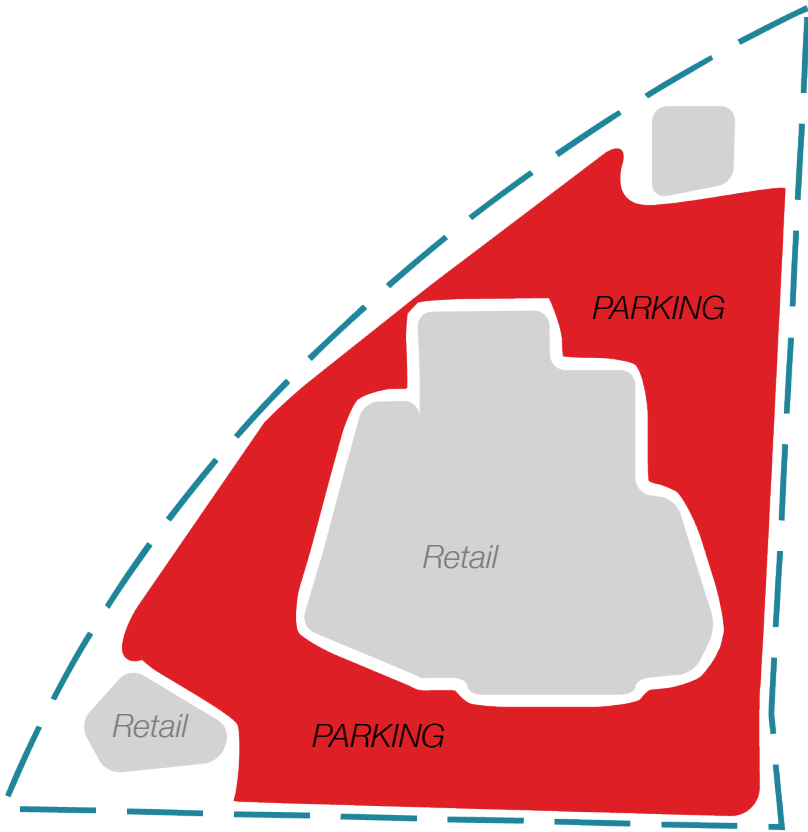
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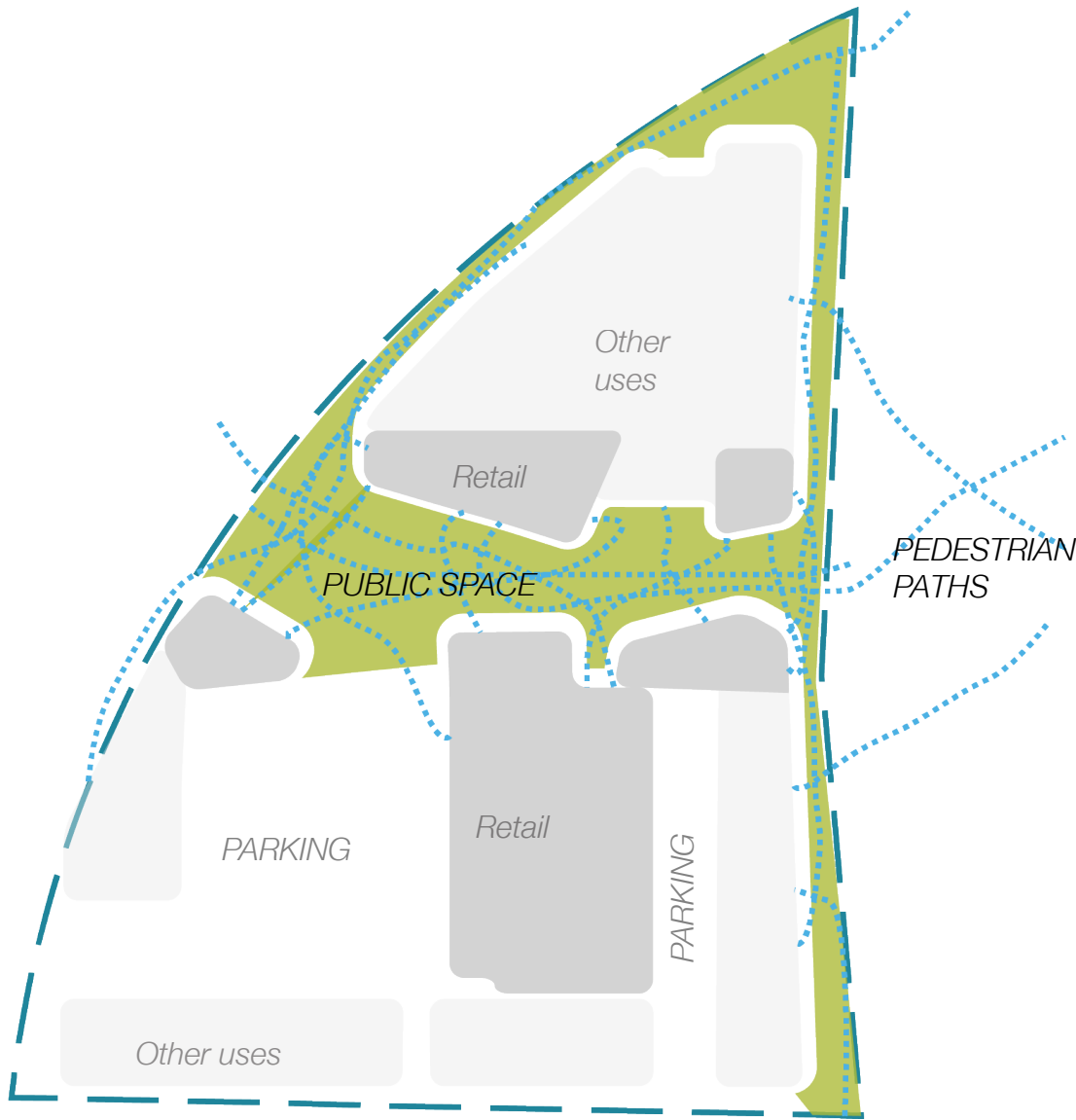
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