
Sent: 9/03/2017 4:42:27 PM
Subject: FW: PP0005/16 - 6 Warriewood Rd - Objection Submission
Attachments: 6 Warriewood Rd Objection_Aventus Property.pdf; 6 Warriewood Rd Objection_Aventus Property.pdf;

From: Kate Parkinson [mailto:kate@aventusproperty.com.au]
Sent: Wednesday, 8 March 2017 3:17 PM
To: Andreas Olsen; Council Mailbox
Subject: PP0005/16 - 6 Warriewood Rd - Objection Submission

Hi Andreas,

As discussed with Kelly Wilkinson, this is a late submission that she indicated would be able to be accepted to include within the Council Report for the above mentioned Development Application.

I sincerely apologise for the delay in this submission, I trust it can still be accepted.

Should you have any questions, please don't hesitate to contact me on the below details.

Kate Parkinson

Acquisitions and Development Manager

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6 March 2017

The General Manager
Northern Beaches Council
PO Box 882
Mona Vale NSW 1660

Dear Sir/Madam,

**RE: 6 JACKSONS RD, 10 & 12 BOONDAH RD WARRIEWOOD (PP0005/16) -
SUBMISSION BY AVENTUS PROPERTY GROUP**

Overview

This submission has been prepared by Aventus Property Group ('Aventus'), owners of the Belrose Super Centre (located at 4-6 Niangala Close, Belrose), which is the largest, purpose-built Large Format Retail Centre on the Northern Beaches. Aventus is Australia's largest specialist fund and asset manager of Large Format Retail (LFR) centres, owning 20 centres in NSW, QLD, VIC, SA and WA.

We are appreciative of the opportunity provided by Council to review and comment on the draft Planning Proposal prepared for the abovementioned land within the 'Southern Buffer' of the Warriewood Valley. We understand that the Planning Proposal was submitted in December 2016 and the Council have sought to welcome views on the proposal prior to making a formal recommendation to either proceed or not proceed to Gateway at an upcoming Council Meeting.

It is our submission that the proposal to accommodate up to 18,000sqm of new bulky goods floor space warrants serious evaluation in terms of the viability of the proposed retail centre and the consequential implications on other centres, namely Belrose Super Centre.

Having reviewed the Planning Proposal documentation in detail, we are strongly concerned with the retail impact of the proposal on Belrose Super Centre, which (as articulated in the Economic Impact Assessment by Leyshon Consulting) will be the largest impact of all surrounding centres. Our view is that this is unacceptable, given the current and ongoing investment at the Centre which is zoned specifically to permit 'bulky goods', unlike the proposal.

Our specific concerns with the Planning Proposal are:

- > Inconsistency with the Centres Hierarchy and Strategic Planning Framework
- > Adverse impacts on surrounding (appropriately zoned) retail centres

Inconsistency with Centres Hierarchy and Strategic Planning Framework

The Planning Proposal which seeks to allow up to 18,000sqm of bulky goods retail is not consistent with the established centres hierarchy.

The proposal does not align with the existing designation in the draft Northern District Plan as a "Town Centre". The Master Plan concept supporting the Planning Proposal seeks to facilitate extension large format retailing, with specific building footprints and built form controls to facilitate this outcome.

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Belrose Super Centre / ABN 35 676 364 249
4-6 Niangala Close / Belrose NSW 2085 / 02 9847 7000
www.belrosupercentre.com.au

The proposal would result in direct and significant duplication of uses with the existing centres hierarchy. The potential for an additional bulky goods development would have significant impact on centres throughout the Warriewood Town Centre catchment, and surrounding areas. However, the largest impact is on Belrose Super Centre. This is discussed in further detail below.

In order to align with future expansion consistent with the draft Subregional strategy, the Southern Buffer should focus on a more diverse offering such as community facilities and services particularly given the proposed new residential development in the precinct.

Adverse Retail Impacts – Belrose Super Centre

The Belrose Super Centre was acquired by Aventus in 2013 and is now a significant asset containing 43 national retailers, comprising of approximately 34,300sqm of Gross Lettable Area. Aventus have worked extremely hard over recent years to significantly enhance the retail offer, experience and attractiveness for its customer base, and to retain its key tenants at the centre. Notably, in 2014 over 2,500sqm of additional LFR floor space was added to the centre. The tenant mix includes the following larger tenants: Domayne; Harvey Norman; Freedom; Anaconda; Nick Scali; JB Hi-Fi; Spotlight; Pet Stock.

The previous Planning Proposal (which was not supported by the JRPP pre-Gateway) proposed a predominantly retail lead scheme, which the JRPP deemed as being 'excessive' given the -18% impact on the Warriewood Square Shopping Centre.

This proposal now seeks to predominantly shift the composition of uses from retail 'shops' to 'bulky goods', now comprising approximately 17,000sqm which would compete directly with Belrose Shopping Centre. This is mirrored in the comment from the Planning Proposal below:

2.4 Economic Considerations

The concept has been substantially refined and repositioned responding to the preliminary assessment provided through the pre-lodgement process. The concept now encompasses primarily employment land uses comprising a bulky goods retail centre. The approach is to provide a substantially employment generating land use for the site. The bulky goods does not seek to compete with the retail offering of Warriewood Square rather provide a complementary offering in the Warriewood local centre identified in the Draft Northern District Plan. The concept is supported by an Economic Impact Assessment, included at Attachment 8.

Belrose is also classified as a 'Local Centre' in the Draft Northern District Plan, and the proposal will directly compete with it. While the potential impact on Warriewood Square has changed from the original Planning Proposal, the Economic Impact Assessment by the applicant states that there will be a **9.6% (or \$16.2 million annual impact in sales) impact on Belrose Super Centre.**

While an independent economic analysis has not been undertaken at this stage (which may indeed identify potentially more of an impact), we are strongly opposed to a proposal which will divert trade from an existing centre in the surrounding locality. On this point, we would recommend that the Council undertake an independent assessment of the economic impact assessment prior to any recommendation that is made to the Council.

This is not an orderly form of development, and we would argue that this impact will potentially prejudice the viability of Belrose Super Centre.

Conclusion

The site is currently zoned for RU2 'Rural Landscape' which is proposed to change to a mixture of uses, predominantly for 'bulky goods' which are ordinarily permitted in the B5 or B7 zones in Warringah LEP 2011. A previous Planning Proposal was not supported by the JRPP to proceed to Gateway for a range of reasons. A key reason was an unreasonable impact on Warriewood Square Shopping Centre. The current Planning Proposal has shifted the composition of uses, with a large proportion of space (up to 18,000sqm) now composed of bulky goods retail.

Our fundamental contention that is that the scale of the proposed bulky goods uses proposed as part of the Planning Proposal will prejudice the viability of Belrose Super Centre and have serious implications for the centre, and other established centres in the surrounding area.

Given the scale of the proposed development, we would recommend that Northern Beaches Council **do not support the proposal.** We also believe that Northern Beaches Council should undertake an independent analysis of the Economic Impact Assessment to verify the potential impacts of the proposal.

We would welcome the opportunity to discuss the issues raised in this submission with Council. We would also request that we are kept informed as to progress and Council's further consideration of this proposal and related proposals.

Kind Regards,



Kate Parkinson

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6 March 2017

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Kate Parkinson

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