24.10.19

Benjamin Price Planner Northern beaches Council 1 Belgrave st Manly 2095

Re; <u>Woolworths DA 2019/1084</u> 31 the Corso Manly.

Dear Ben, I am writing to express concerns with several aspects of the Woolworths proposal.

The summary of the DA is that Woolworths fit out an ex Commonwealth bank site with a Woolworths Metro. This has storage and loading at the rear, retail in the middle and checkout and cafe at the front.

The proposal indicates that loading will be via the rear lane and utilise the existing loading zones adjacent to whistler st carpark.

The retail entry will be on the Corso and all deliveries, waste and new mechanical services plus signage will be on market lane.

The issues with this proposal are;

1- LOADING AND DELIVERIES

PROPOSAL;

Deliveries will be made daily with 2 trucks (heavy rigid vehicles) approximately 11m long between 5am and 8am. These trucks would use the existing loading zones adjacent to the whistler st carpark. Unloading times are estimated at 30 -45 minutes. Stock is to be unloaded onto pallets and trollied into Woolworths via a new rear loading bay at the rear of the proposed Woolworths. These 2 trucks would exit the lanes via market lane, Sydney rd plaza and Central ave. Further deliveries are anticipated using regular size delivery vehicles with smaller non palletised loads.

ISSUES;

i- The loading proposal requires access on a daily basis to on street loading bays that currently have a 15 minute limit. The existing loading zone length of 19m is less the required 25m of truck plus pallet access at the rear. It is not physically possible to get 2 trucks into the existing loading zones and allow pallet access to the drop platforms.

ii- The proposal also requires unimpeded access to the loading zones every morning. These loading zones are currently very active in the morning being used for deliveries to the Ivanhoe, Chemist warehouse as well as other adjoining smaller businesses. If another vehicle is using the loading zones the entire loading strategy of Woolworths fails. It is highly improbable that the Woolworths trucks could get unimpeded access to the loading zones 7 days per week, 365 days per year.

If the Woolworths trucks start to queue then garbage trucks and other delivery vehicles will be prevented form accessing the lanes.

iii- Market place is the main access point for waste collection and each morning around 5-7 garbage trucks access the lane. The loading area can easily become congested with simultaneous loading and required access. If Woolworths are permitted to use the area for loading it will significantly add to the congestion. This could result in trucks queuing back out onto Whistler street.

iv- The proposed exit for the Delivery trucks is via market lane, Sydney Rd and Central Ave. These are areas that are becoming increasingly pedestrianised. Adding large vehicle movements to pedestrian spaces is counter to Councils strategy of activating laneways. The truck turning circles may make the proposed left hand turn from Market land into Sydney road very tight.

v- The indicated unloading times of 30 - 45 minutes significantly exceed the current maximum permissible time of 15 minutes in the loading zones.

vi- Noise from loading and unloading as well as the running of diesel motors and refrigeration from 5am is unacceptable to the residences that are adjacent to the loading area. This issue could be compounded should trucks park in the loading areas prior to 5 am and leave engines and or compressors running during the wait times.

vii- The loading zones proposed for unloading do not comply with AS 2890.2 for Heavy Rigid vehicles. This standard requires HRV parking bays to be 3.5m x 12.5m and an adjacent trafficable lane width of 3.5m. The existing loading bay is 2.4m wide with 3.5m lane width. The loading zones off whistler street are a minor service area that is not adequate in clearance space, bay widths or adjacent lane widths to cater for vehicles of this size. The loading proposals of Woolworths show vehicles that exceed the existing design maximums of the loading zone and lane access.

viii- The presence of 2 Woolworths trucks in the loading zones for 30 -45 minutes will prevent other delivery vehicles being able to use the spaces. This will create further congestion in an already over utilised loading and parking area.

Ix- AS 2890.2 indicates a HRV turning path of minimum radius of 12.5m. The left turn exit onto Sydney road does not allow a turn of this radius. This turn is further complicated if tables and chairs are on the footpath at Ground Zero cafe.

2- WASTE MANAGEMENT

PROPOSAL;

Cardboard to be compacted in bale presses and collected 2-3 times per week. General waste, 4-5 660l bins to be collected 3 times per week.

ISSUES;

a- This is a large amount of waste that will be put out onto Market lane for collection 3 mornings per week. Unless strongly managed this has the potential to detract from the amenity of the laneways.

3- Sustainability.

PROPOSAL;

Woolworths have shown a take out cafe at the front part of the tenancy fronting the Corso.

ISSUES;

Woolworths cafe at the front section of the tenancy has no in house service area and no facilities for the collection of customer waste.

This means that everything purchased from the cafe will be in single use packaging. Hence the Cafe will significantly add to the waste management of Councils public waste bins.

As Council actively supports environmentally sound waste management practices it needs to manage and discourage business's that have as their model high single use waste generation and negligible reuse.

4- LANEWAY ACTIVATION

PROPOSAL;

The rear face of market lane is to have new Woolworths signage, exhaust grills for mechanical handling, plant room roller shutter and a loading entry.

ISSUES;

The planned modifications to the rear lane present no strategies to activate an increasingly pedestrianised space and the proposals completely ignore and compromise the quality of the laneway. The proposed market lane elevation of Woolworths with the loading / waste proposals / signage seriously impact the quality of the urban space and will detract from the laneway amenity. The Woolworths proposal is counter to the Council policy of laneway activation and the proposal will have a negative impact on the streetscape and activity in Market Lane.

CONCLUSION

The Woolworths Metro proposal presents a number of serious issues that will have profound impacts on the loading zones, laneways and amenity at Market Place and adjacent public spaces.

The loading strategy is deeply flawed and will not work. It will result in chaos and congestion in the loading areas for the term of the Woolworths lease time. This could result in 20 years of loading mayhem in a very restricted area that requires daily access by service vehicles as well as delivery vehicles servicing nearby businesses. The vehicle exit route does not work.

While the Woolworths proposal is a "metro" its loading strategy is more supermarket, reliant on heavy vehicle movements but utilising areas that are not designed or capable of being used in the manner proposed. The proposed metro is of a scale of operation that is not suitable for the proposed location. The loading area they propose to use is only suitable for smaller vehicles with smaller delivery loads.

The cafe business model, as it is essentially take away, will generate significant waste that will find its way into Council bins. This is an unsustainable model that could have a 20 year lifespan and it does not fit with our pressing environmental obligations. It shifts business costs onto the local ratepayers.

The cafe also appears to be laid out so that customer collection for coffee is on the Corso via the cafe window adjacent to the coffee machine. This has the potential to cause pedestrian bottlenecks on busy weekends as well as further exacerbating waste issues.

The Woolworths Metro proposal is an elephant masquerading as a poodle. It is large, it has big trucks coming in every day of its retail life, it will spew out garbage onto the bins of the Corso and surrounding areas, it will detract from the amenity of adjacent pedestrian spaces, it will disrupt residents and it will clog up vehicle access points.

The Woolworths proposal will cause permanent disruption to the loading zones and permanent waste generation onto public areas. It is a retail model that exceeds the serviceable scale of the site that it wants to occupy.



Manly