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**RE: DA2020/0393 - 28 Lockwood Avenue BELROSE NSW 2085**

Re- DA 2020/0393- 28 Lockwood Avenue, Belrose

This submission raises OBJECTIONS to the Development Application referred to above based on its failure to meet the objectives of Zone B2 - Local Centre.

1. The first objective of the zone is "to provide a range of retail, business, entertainment and community uses that serve the needs of the people who live in, work in and visit the local area". Whilst the Development Application does propose the construction of retail premises and a gym, the significant aspect of the objective is that they serve the needs of the people who live and work and visit the local area.

As many other submissions have noted, there is no evidence that there is any demand for additional retail premises or another gym in this location. There are currently unoccupied retail spaces in both Glenrose Village and the Forest Way complex. From my recollection there have always been some unoccupied tenancies in Glenrose Village. It is therefore very clear that existing retail provisions more than satisfy the needs of the local area. Moreover, the rapidly rising use of on-line shopping must indicate that future demand for retail space in this location is more likely to decline rather than rise.

The wisdom of providing additional retail space adjacent to Glenrose Village should also be considered in light of the proposed Town Centre adjacent to the Northern Beaches Hospital. This latter proposal has the potential to provide a vibrant retail precinct in a central location. However, this would place additional pressure on smaller shopping centres. Therefore any additional provision of retail space should be reserved for the proposed Town Centre.

The only indication of the type of retail proposed for 28 Lockwood Avenue comes from the Traffic and Parking Assessment which identifies the extent and types of retail as:  
1,756 sq. m. Slow Trade (defined by the RMS as major Department stores such as David Jones and Grace Brothers, furniture, electrical and utility goods stores)  
346 sq. m. Faster Trade (defined by the RMS as discount department stores such as K-Mart and Target, together with larger specialist stores such as Fosseys)  
1,665 sq. m. Specialty Shops and Secondary retail (defined by the RMS as including speciality shops and take-away stores such as McDonalds. These stores are grouped since they tend not be primary attractors to the centre)

One cannot help but think that the above figures/retail split have been plucked out of the air to have the effect of reducing the amount of car parking required by the development. (I also note that the above figures total 3,767 sq.m. GFA whereas in the Master Set, Drawing No. DA001 puts the retail total as 4,035 sq.m. GFA)

It is surely almost impossible to believe that any stores fitting into the first two categories would take space in the proposed development, not least because such a proposition does not take into consideration the existence of the nearby SupaCentre. It therefore seems inevitable that all the retail would be of the category that the RMS defines as not being primary attractors to a centre and for which the existing Glenrose Village already has - and has always had - vacancies.

It is ironic that the Development Application recognises the need not to provide a supermarket because of the existence of two in Glenrose Village whilst failing to acknowledge that the persistent vacancies in Glenrose Village clearly denote that there is no need to provide an additional 3,767 (or 4,035) sq. metres of specialty shops.

Even within a very pleasant and successful centre such as Glenrose Village, it is rather dispiriting to see businesses close, shops being boarded up, "for lease" signs going up and that being perpetuated over time. When it is very clear that the general community does not need additional retail space, it would surely be irresponsible and at odds with the interests of the existing tenants of Glenrose Village (who I do not know) to encourage further supply. There is definitely a human cost involved in creating additional retail space that is at odds with the laws of supply and demand.

As it is the existence of the retail component that enables the construction of "shop top housing" it is fundamentally important that the starting point of any assessment of the D.A. is an evaluation of the likelihood of the retail component being successful over the long term. On the evidence, what is most likely to occur is that the proposed retail component will not be fully occupied and may be largely unoccupied. Therefore, there is a very real danger that the proposed development will be the exact opposite of the vibrant precinct portrayed in the D.A.'s photomontages and instead will have all of the visual and social problems that afflict poorly occupied retail areas. This would be of detriment to the community and a permanent monument to bad planning.

2. In relation to the second objective: In view of the above, it seems highly unlikely that the development would result in the 200 new, permanent jobs referred to in the documentation. The benefit of the small number of new jobs that might actually be provided is more than counter-balanced by the loss of amenity caused to the community by the failure of the D.A. to meet the other objectives of the B2 Zone.

3. Taking the third and fourth objectives together: The proposed development will do nothing to increase the existing community's amount of walking or cycling. (See also point 4)

4. Taking the fifth and sixth objectives together: There are numerous ways in which the proposed development as a whole does not comply with these objectives, but this submission concentrates on the proposed southern elevation and, in particular, on the provision of shops in that location.

(a) The proposed introduction of retail premises to Lockwood Avenue and the beginning of Glen Street would change the streetscape in a most extreme way. The existing well-treed green space was a pleasant transition from residential premises to the shopping precinct. It complimented the greenery on the opposite sides of both Lockwood and Glen Street and, together with the Library and children's play area, reinforced the "Forest" atmosphere and sense of community. The proposed development completely removes those prior benefits and replaces them with an abrupt change from residential to retail, with the built environment

dominating the corner position.

(b) The abruptness of the transition and the structural dominance would be magnified by the fact that no set-back from the site boundary is proposed. This is counter to all surrounding buildings, including Glenrose Village and 54 Glen Street.

(c) The inappropriateness of the lack of set-back is actually highlighted by the photomontage used as the cover-sheet of the Master Set of documents. Whilst there will be a standard width pavement abutting the proposed retail, the artist has shown a wide pavement capable of permitting pedestrians to comfortably walk at least six abreast, allowing pedestrians to stop and chat without impeding others. The artist has inherently recognised that the mass of the building will be far more dominating and visually less appealing without a wide horizontal plane and that a standard width pavement would be unsuitable for pedestrians; for entering and exiting the retail premises; and for any chance of achieving the relaxed community feel he or she is trying to portray.

(d) The lack of set-back will also reduce motorists' vision.

(e) At the very least it is essential that these shops are set back.

(f) Whilst the various photomontages make the shop fronts look reasonably attractive and cohesive it is far more likely that in reality there would be a lack of cohesion if the premises are occupied by a variety of styles/types of occupants, with differing window displays, etc. This would further magnify the adverse visual effect of these retail premises relative to their position in a residential street and on a prominent corner and without the mitigation of any set-back. This could become a truly dreadful eyesore, particularly if some of these shops are empty.

(g) As discussed above, there is no evidence that there is any requirement for additional retail and it is unlikely that the proposed complex would be fully tenanted. The retail premises proposed to be located in Lockwood Avenue do not appear to be internally connected to the rest of the complex. As these retail premises are the ones that create the most issues in terms of inappropriate siting, poor visual effect, etc. and are separate from the main complex, they should be excluded from the design and the space used in a more complimentary way.

(h) The owners of all surrounding properties have to abide by Council regulations regarding set-backs, etc. when wanting to build or make changes to their property. It would be extraordinary if the developer of this speculative development did not have to comply with the same regulations, even though what was proposed to be built was not in the interests of the community and might never be occupied.