
Sent: 27/06/2015 5:08:12 PM
Subject: Comment re Meriton Planning Proposal, Site B, Dee Why
Attachments: Meriton Site B Planning Proposal.docx;

Please find my comment attached. I note that the closing date was originally advertised as 28 June 2015 but has apparently been changed very recently, and without apparent publicity, to 26 June 2015. I trust that my submission will be accepted.

Richard Michell

Comment re PLANNING PROPOSAL

Amended as per Gateway Determination dated 26 February 2015

'Site B' – Pittwater Road, Howard and Oaks Avenue, Dee Why

I oppose several important aspects of the Planning Proposal.

1. Incremental changes

I strongly object to the applicant submitting further significant changes to the proposal post the Gateway determination. These are not minor changes from the perspective of the visual impact and bulk of the development. By presenting changes incrementally, the overall impact is disguised.

2. Imbalance of Residential/Commercial

Being located centrally, on the flat portion of Dee Why, and immediately adjacent to both the north south and east west public and private transport routes, this development is on an absolutely key strategic site - key for both the Dee Why Town Centre and for Warringah. It will be the largest development to date in Dee Why, and by a significant margin.

When compared to the unintegrated developments that exist currently on the site, it will provide an additional 461 residential home units (there are none presently). However it will reduce the amount of floor area available for jobs provision via retail and commercial uses.

I base this statement on the data provided by the proponent in a report by HillPDA. The respective retail/commercial floor areas listed in the report are:

Existing site = 12,790 sqm

Proposed development = 11,536 sqm

There is a proposed reduction of 10%.

This proposed reduction of jobs-providing floor area flies in the face of all planning documents – local and regional - that have been produced for Warringah over the past 10 years. Because of its central location they have all, to greater or lesser extent, recommended an increase in retail and particularly commercial activity in Dee Why. Certainly, none has recommended a reduction.

The currently-approved LEP and DA for this site takes a far more responsible approach. It recognises its strategic planning importance. The original accumulator of the site (Multiplex) had a vision of a high quality residential and retail development, plus a significant commercial development in a “separate” but integrated structure. This approach gave the possibility of seriously promoting Dee Why for commercial uses as well as residential. It did not just supply “commercial” floor area scattered around the first floor of the development but proposed an additional concentrated “critical mass”. In my opinion, this concept should not be abandoned without appropriate analysis. The HillPDA report does not address it.

It is to me appalling that Council, unlike WDAP and the Department, is simply lying down on this absolutely-key future planning matter. The phrase *“still ensuring a strong commercial presence on the site”*, that is in the staff report, is not the same as being a *“priority location for employment, retail, housing, services and mixed-uses”*, as is required for a Strategic Centre under the State Government’s Plan for Growing Sydney.

The further statement by staff that the proposed development *“will help to deliver additional housing supply and urban renewal in proximity to local employment opportunities and a well networked transport system”* is a tacit acknowledgement that the now-proposed development will not play any significant part in supplying employment itself.

Rather than addressing the underlying planning issue, the HillPDA report attempts to show that the propose reduced floor space will deliver more jobs than the current space - it tacitly defines current as the situation on the site today, not the situation when Multiplex first began accumulating it in 2007/2008 – and it becomes quite creative in this attempt. As simple examples, general retail is assumed to provide one job for every 28 sqm of floor space in the new development but in the current it is assumed to require 32 sqm per worker. Also, it condemns the upper level of the current Vumbaca building to large format retail, providing only one job every 80 sqm, while the same type of area can be a gymnasium in the new development, providing a job for every 50 sqm. (Note, there is an error in the heading of Column 3 in HillPDA’s Table 1. A gymnasium does not provide 50 jobs for every square metre of floor space. The heading Workers/sqm should presumably read Sqm/Worker).

However, the crowning creative act is to claim that the residential portion of the development will provide incremental jobs because a percentage of residents will work from home. This residential source accounts for 10% of the total jobs that HillPDA claims the development will create. In my opinion, this argument is sheer sophistry. Those residents who work from home in this development would work from home no matter where they lived. Nothing is being provided to facilitate or encourage this activity. In fact, the type of residential development proposed – with no public access to the residential portion and body corporate rules applying to it - would discourage or not allow many potential home occupations. The development cannot claim to create these jobs. The residents bring them with them, to wherever they live.

Rather than arguing the detail, or choosing some frozen moment in time, it is obvious to any impartial person that a development that provides less floor area for job creating activities will, over time, provide less jobs. As already stated, such an outcome is against all planning proposals for Dee Why.

The main argument for the unbalanced development from the proponent is that, under the current Sydney and Northern Beaches housing boom cum bubble, it will be able to sell residential floor space essentially immediately whereas it may have to wait six years or more to sell the retail/commercial space. Even if the six years estimate is accepted, this is a short period in planning terms. It is even short in the development life of this site. It has been in train for seven years to date and it will be an elapsed 10 years before it is finished.

However, the six year estimate is probably pessimistic. At the simplest level, it takes no account that the current tenants will be tipped out onto the rental market to allow construction (this is already happening) and so they will take up some of the existing vacancies as some proportion of them will wish

to continue in business in Dee Why. It also supposes no impact of the other changes to Dee Why under the Masterplan on the demand for commercial and retail space..

3. Bulk

Although highly controversial re the heights of the two residential towers, the original development proposed by Multiplex had significant and obvious architectural merit. The two towers were slim and the remainder of the site was broken into precincts with various heights, to avoid the creation of one large mass. Separations from surrounding developments were also respected.

The now-proposed development destroys this merit. The towers are bulked up and no longer present as slim-line. Almost all articulation of the heights of the non-tower buildings is removed, most areas with lower heights being increased to the height of the adjoining higher areas. The resulting visual effect is now of one huge box sitting on the ground, with another pair of tall boxes sitting on top of it. The original architectural merit is lost.

I strongly challenge the staff statement that *“the overall building volume remains generally consistent with that approved under DA2007/1429”*. Numerically the percentage increase may be relatively modest but the visual impact is major.

The driving force for the proposed built form changes is simply to cram in the maximum number of residential units on the site and hence maximise the return on the investment. The increased financial return is at the significant community cost of a worsened visual impact of the development.

4. Frontage to Pittwater Road

Starting with Dickson Rothschild in 1998, various consultants commissioned by Warringah Council have explained and extolled the merits of podiums and upper floor setbacks on street frontages. The current Masterplan for Dee Why devotes a significant section to this matter and the relevant document has been included as Attachment 7 in this public exhibition. Re the Pittwater Road frontage, the Masterplan consultants state, after considering various alternatives, that *“Pittwater Road is a major arterial road with 6 lanes. These images show that a 4 storey Podium provides an appropriate ratio of enclosure for pedestrians, and a legible environment for motorists. Planting and awnings reinforce the human scale of what otherwise could be a hostile environment in terms of amenity”*.

The Planning Proposal completely ignores all of these studies. It now proposes that there be no podium along the Pittwater Road frontage. Instead there will apparently be a sheer, vertical nine storey wall. The hostility of the environment that it will create, from a human scale perspective, can only be imagined.

The rationale for the proposed change is, to me at least, completely unclear. It is claimed to be, in some unexplained manner, related to the proposed bus bay. This bay exists impacts only the first two storeys and the reason that all vertical articulation above it must go is to me unfathomable.

If this has to be the outcome of providing a bus bay then the bay should be abandoned. It was proposed at a time before the kerbside lane on Pittwater Road was converted to a dedicated week-

morning bus lane. Under this scenario, and the fact that at other times parking is allowed along this side of Pittwater Road, a bus bay serves no traffic flow function. It should also be noted that, when proposed in the 2007 Multiplex DA, the STA opposed it. They said it was too short to accommodate their needs in the morning peak. What should be provided is an appropriate passenger waiting area.

5. Council's dereliction of its planning duties

In my opinion, Council has largely abandoned its planning responsibilities with respect to this site. It has made regular public statements such as "anything would be better than what is in Dee Why now" and "just do something". Councillors may have a need to be re-elected but staff do not. They are employed for their professional skills.

I have listed below just a few of many instances where, in my opinion, in the Planning Proposal Report May 2015 staff have simply become advocates for the developer.

a) Page 25 of staff report

Are there any other likely environmental effects as a result of the planning proposal and how they are proposed to be managed?

Staff response - No. The proposal seeks to deliver the same development outcome for the site as DA2007/1249. The likely environmental effects will remain consistent with those assessed during the Assessment of that application

How can a development that increases the number of residential units from 300 to 461, and reduces the floor space dedicated to retail/commercial from 37,000 sqm to 11,500 sqm be described as "seeking to deliver the same development outcome for the site"?

b) Page 28 of staff report

The proposed WLEP amendments are deemed acceptable as they;

- Do not increase the overall building volume compared to the development approved under DA2007/1249.*
- Maintain a comparable quantum of floorspace to that approved under DA2007/1249*
- Continue to regulate development through prescriptive building height controls that are not able to be varied through the application of Clause 4.6 Exception to development standards.*

Every proposal made under the first and the amended planning proposal seeks to increase the building volume and floor space. Why are no figures quote to support the first two statements? With regard to the third, this entire planning proposal is about varying the "prescriptive building height controls" and Staff are supporting every one of the proposed variations. What possible reassurance can the statement "continue to regulate" give to residents?

This development will be in place for at least the next 50 years. It needs to be planned with a horizon of at least 15 years, as per the State government plans. It is appalling that it was left to residents to raise the important issue of the appropriate role for this site in supplying employment opportunities in the future Warringah, and to take it to WDAP. To their credit, WDAP took the issue most seriously, as has the Department. Apparently-blinded by its political desire to be seen to be doing something in Dee Why, Council still does not.

Developers have very short term horizons. Planners must not let this override their own responsibilities.

Richard Michell
11 Vale Avenue
Dee Why
26 June 2015