Sent:	7/01/2021 11:02:00 AM
Subject:	Re: Submission Acknowledgment
Attachments:	DA20200393 Submit2021.pdf;

Dear Sir/Madam,

I am writing to oppose the proposed DA2020/0393. Please find attached .PDF DA20200393_Submit2021 to contain complete comments with images. Please read this document when reviewing comments.

Cheers

Michael Tanner

On Thu, Jan 7, 2021 at 10:55 AM <<u>DASUB@northernbeaches.nsw.gov.au</u>> wrote: 07/01/2021

MR Michael Tanner 10 Beckman PDE Frenchs Forest NSW 2086

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

Dear Sir/Madam,

Thank you for your submission in respect of the above-mentioned property. Please be reminded that under provision of the Government Information Public Access Act, all submissions will be posted on Council's Website against the application.

The matters that you have raised will be noted and taken into consideration in the assessment of the proposal process. However, please note as previously stated in the notification letter, Council will not enter into correspondence in respect of any submission due to the large number of submissions Council receives annually.

Should you wish to monitor the progress of this development application, please feel free to visit the Planning and Development section of Council's Website at <u>www.northernbeaches.nsw.gov.au</u>.

We thank you for your submission and should you have any queries, please do not hesitate to contact Council on 1300 434 434.

Yours faithfully

Northern Beaches Council

For your reference please find below a copy of your submission:

04/01/2021 Mr Michael Tanner 10 Beckman Pde Frenchs Forest Re: Application DA2020/0393 28 Lockwood Ave Belrose, 2085 Description: New - Demolition works and construction of a shop top housing development comprising retail premises, 51 dwellings, gym, basement carparking and landscaping

Dear Sir/Madam,

I am writing to oppose the proposed DA2020/0393. The objections are that the development is too large for the site, will create a complex traffic environment, is not in character with locality and does not meet the objectives and goals outline in the Northern District Plan (NDP). The NDP developed by the Northern Beaches Council, the Department of Planning and Greater Sydney Commissions plans Glenrose to be a "village" to support the local community and reflect community expectations.

A summary of objections to the DA is listed below:

1. The SEPP65 report supplied in the DA incorrectly states that Belrose will become high density residential locality and the proposed Structure will help transition.

2. The development exceeds zoning height limits;

3. The buildings bulk is too big for the lot; the proposed Structure decreases open space and new space is no longer community open space;

4. The proposed 51 dwellings in a mixed used land use exceed any other in the locality;

5. The lack of setback of the Structure does not align with setback on Lockwood Avenue and, does not reflect the local community expectation of street frontage;

6. The previous intuitive pedestrian and cycle desire lines to shop, parks and schools are now blocked by the Structure;

7. The retail floor space ratio will create oversupply in the area;

8. The number of vehicle access points (three) to the Structure via Glenrose Place increase complexity for drivers and increases risk of accidents for drivers, pedestrians and cyclists.
9. The traffic assessment modelling does not consider all vehicle types nor has it model event traffic generated by the regular events at Glen St Theatre and library; and
10. The proposed traffic solution for controlled access to Structure will add to vehicle congestion and increase complexity for driver decision making in Glenrose Place and increase the risk of pedestrian, cyclist and/or vehicle accidents.

1: The SEPP65 report supplied in the DA does not consider the strategic planning for the Region:

The SEPP65 DKO report states that:

"The bulk and height of the design proposal has been carefully considered to respond to Belrose's

transition into a higher density area."

I must assume that the SEPP65 report is describing the Frenchs Forest Specialist Centre where the defined boundaries of High and Medium housing density are to be delivered. The local area surrounding Glenrose Village will provide alternative housing stock (low density) ensuring there is choice in the area.

N6 of the objectives from the Northern District Plan is to create and renew great places and local centres and respecting the District's heritage. The plan identifies Glenrose as village -

not high density residential.

The SEPP65 DKO report states that:

Well designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood. And

The proposed development complies with ADG setback requirements to most of its boundaries.

The local community has voiced their objection to the lack of setback on Lockwood Avenue. The Structure's setback does not align with existing setbacks on Lockwood Ave or any of the surrounding area.

The average setback for Northern side on Lockwood Ave is 13.5 metres (approx.); see figure 1. The development has no setback on Lockwood Ave and is replacing the existing generous setback and open space with narrow retail street frontage - not in keeping with locality. The Street Frontage proposed are associated with strip shops in Manly, Seaforth and Fairlight.

The risk of vehicle and pedestrian or cyclist accidents will increase at the Lockwood Ave and Glen St intersection with the lack of an appropriate setback. The existing open space and setback provides vehicles turning right from Glen St into Lockwood Ave with early and good visibility of the pedestrian crossing on and vehicles heading south along Lockwood Ave.

Figure 1

To increase the attractiveness of walking and cycling and safety on Lockwood Ave and Glen St a wide shared path is required for locals to walk, cycle, observe and participate; see figure 2, and the pedestrian crossing on Lockwood Ave should be upgraded to a raised wombat crossing with wide drop kerbs to improve safety and pedestrian and cyclist amenity.

Figure 2

The SEPP65 DKO report states that:

The concept proposes at its heart a generous, central square ... providing a social gathering place for locals activated by a diversity of retail shops, public art, landscape and place-making activities. Within a local centre devoid of such spaces, it will be particularly attractive for locals offering a sense of safety, comfort and interest.

The DKO report has omitted the mention the numerous public spaces surrounding Glenrose Shopping Village. These numerous spaces have been utilised by locals to gather during the various stages of Covid19 lockdown, locals have safely gathered after collecting have their coffees and snacks to make use of the shared public spaces nearby are examples Community area near the Tennis courts, the forecourt of Glenrose Library, the forecourt of Energise Gym and Glen St Theatre and facilities at Lionel Watts. These are public open space not privately owned for residents.

The under estimation of the SEPP65 of how the "community" functions around the Village is a concern and may provide L&E court with incorrect view of the area.

2: The development exceeds the maximum height limits;

The SEPP65 states:

The proposal complies with Local Centre under the Warringah LEP 2011 and will complement the desired future character of the area.

The development fails to meet height requirements of B2 zoning height of 8.5 metres. Some minor breaches of height in the proposed Structure may have been acceptable, however as displayed in Section D of the Master Plan the whole of level one exceeds the 8.5 metre limit - in some places by 3.8 metres. All other B2 mixed used developments within 1.5 kilometres of the site comply with zoning regulations.

3: The buildings bulk is too big

The development is not in character with the locality. There is no shop-top housing of this scale within the locality, the area nearby has three smaller shop-top housing developments with 10 - 12 dwellings and 8-12 retail; see figure 3. These mixed-use developments with shop-top housing are the appropriate scale for the locality.

The buildings bulk and footprint are too big for the lot, the proposal allows open space for the public realm to be locked up in the internal square. The former site provided 81% open space to public, which included a playground, mature native trees and a direct and safe pedestrian path between Lockwood Ave and Glenrose Shopping Village.

4: DA exceeds any complex in the locality

The proposed 51 dwellings exceed any mixed used buildings in the locality. Residential developments with a similar number and type of dwellings are in Forestville Town Centre - a ten-minute car trip out of peak, others are found in nearby Strategic Centres of Dee Why - Brookvale.

The proposed Structure's retail is inappropriate for the area. The Structure is next door to Glenrose Shopping Village, a "righted sized" retail shopping complex which contains two large supermarkets, two dozen variety of stores, a gym and numerous medical facilities.

There is a plentiful supply of retail in the area. The Structure's 30-minute walk catchment will overlap with Glenrose Shopping Village, ForestWay shopping centre (part of the Frenchs Forest Specialist Centre) and the existing smaller "corner store" retail.

The additional retail in the Structure will place additional financial pressure on the 'corner store' and in turn possible decrease the walkability of the area.

6: Intuitive pedestrian desire blocked

The previous pedestrian desire lines from the south and west to Glenrose Shopping Village are redirected around the development; see figure 4. The existing paths were direct, safe and stair free. School children and others use the low traffic Peacock Parade as the major walking and cycling route between Davidson High School and Mimosa Public School to the Glenrose Shopping Village.

The Structure will direct journeys from South and West down the Western edge of Structure increasing risks of accidents between pedestrian and vehicles at the entry to Glenrose

Shopping Village via car-park drive.

Figure 4

7,8,9: Traffic

There several concerns/questions of the traffic modelling undertaken in support of the DA, as outlined below:

• The traffic modelling has not considered the suggested solution for a controlled entry to the Structure in Glenrose PI. The concern is that when more than one heavy vehicle is stopped on red light, a queue will occur in Glen Place; see figure 5.

Figure 5

• Pedestrian safety has been negatively impacted as the Structure has three vehicle crossing points; see figure 6.

Figure 6

• There has been no modelling or observations of special events e.g. dance performances and shows at Glen St Theatre which generate substantial vehicle traffic and pedestrian demand.

• The car parking falls short of the councils DCP;

• The SIDRA modelling produces speeds for vehicles are above sign posted speeds i.e. 50 Km and 25 Km. The speeds in Glenrose Place range from 47.5 km/hr to 52.5 km/hr; has the model been correctly constrained?

• The heavy vehicle sweep lines, even with a viewing station for the Structure clash with those of the Glenrose Shopping Village service and waste facilities and the Return and Earn recycle centre; and

• The increase in 'white van' deliveries and service vehicles for dwellings and retail has not been adequately addressed.

Conclusion

The proposal is too large and too high for the site and does not meet community expectations for such a prime location - the few benefits outweigh the many negatives. The Northern District Plan calls for collaboration when renewing local centres; if this had been undertaken and acted on the DA may well have delivered a place that meets local community expectations. The community and the Council should not be satisfied with a development which "generally" meets planning goals.

Feedback

I have lived in the Forest for over 20 years and I have a reasonably large network of friends and acquaintances, most agree that the library site can not remain in current state and that a right sized development is necessary. Most agree there is a the need for a increase in unit style dwellings in the locality, however there concern the character of the area will be lost with more age care facilities at Belrose, the over 55's at Skyline (in Frenchs Forest Centre), the delivery of high and medium density in new Frenchs Forest Centre and the emergence of apartments on Warringah Road, Forestway and Allambie Roads. The other concern is that Developers will breach LEP rules at this location and this will cascade throughout the Forest.

My full submission is in attachment DA20200393_Submit2021.

Regards

Michael Tanner

Northern Beaches Council

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Description: New - Demolition works and construction of a shop top housing development comprising retail premises, 51 dwellings, gym, basement carparking and landscaping

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Original Pedestrian Flows

Proposed Pedestrian Flows

Figure 4

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• Pedestrian safety has been negatively impacted as the Structure has three vehicle crossing points; see figure 6.



Glenrose Place is no longer a place for people. The cul-de-sac will become a high-risk area for pedestrian, bike and vehicle accidents

Figure 6

- There has been no modelling or observations of special events e.g. dance performances and shows at Glen St Theatre which generate substantial vehicle traffic and pedestrian demand.
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Regards

Michael Tanner P.S

There are numerous errors in the SEPP65 report and if you want, I can document them all e.g. Northern Beaches Hospital Precinct is in wrong location. I'm just not sure if this will help the decision process.