
Sent: 20/09/2021 2:16:03 AM
Subject: Lockwood Ave/old Belrose Library development
Attachments: Submission regarding the Development Application for 28 Lockwood Avenue, Belrose.pdf;

Dear Mr Collier,

Re.: Old Belrose Library Development Submissions

Unfortunately, we have just "lost" over a week due to complications following eye surgery, which rendered typing out of the question.

That means we are now over the Council's stipulated time for public submissions.

In the circumstances, could you please facilitate our submission being included with the other residents' submissions.

We would be grateful, as it is a matter of considerable concern to us and our neighbours.

Yours sincerely,

Phillip Smiles and Lyn Turner

2 Beckman Pde, Belrose.

T: 9975 4244

M: 0403 054 729

Sent from [Mail](#) for Windows 10

SUBMISSION REGARDING THE NOTICE OF PROPOSED DEVELOPMENT - NSW LAND AND ENVIRONMENT COURT AMENDED PLANS

LOT 1 DP 1199795 - 28 LOCKWOOD AVENUE, BELROSE

As residents living one block from the proposed development for over 18 years (and in no other capacity, we write with concern that, over a 4 year period the Developer, Platinum Property Group has continued to demonstrate insensitivity to the existing community, ignorance or rejection of an appropriate level of care as to the development's visual presentation within the precinct, and continuing ignorance or rejection of an appropriate level of concern for the impact associated with traffic generation associated with the previous attempts, and this is reflected in the current attempt to seek development approval.

The current application to Northern Beaches Council appears to be another attempt to lay a gloss over development ambitions and create an overly dense built facility which is out of keeping with the existing and long term surrounding community's housing development. The application adopts little of the design and size sensitivities of all the other non-residential structures in the general area.

We accept that a previous Council made the decision to sell community property and it appears the property was sold without the publication of clear development guidelines as a condition of purchase. However, this cannot be an excuse for a developer to attempt to create a fundamentally unsatisfactory built environment, attracting the criticisms we have summarised in this submission and that other local residents have presented.

Please note that our views are not only those of the two signatories alone. The sense of community that exists in the general area of the proposed development means there is frequent opportunity and willingness to communicate amongst many of the residents.

This has been supplemented by email and telephone contact and obeying pandemic-ordered personal contact as we exercise and pass by on our walks in the local streets, or at the Frenchs Forest Showground Dog Park and Lionel Watts playground/playing field precinct. We are unaware of any local resident that has expressed support or given legitimate reasons for the approval of the currently proposed development.

We appreciate that our comments are directed at reports prepared by paid advisers working for the developer. However, as these entities are agents of the developer, and for convenience of expression, we refer to all as emanating from the developer

The standards referred to

The "Development Application SEPP 65 Report", prepared for the developers, provides a very convenient framework on which to base our many concerns. We consider the content of the introduction and a number of the standards to which it refers, before making our additional critical comment.

"Development Overview"

We note two statements in the Report's introduction with which we fundamentally disagree.

Concerning the development:

1. *"...responds to its location and future urban context"*.

Our response - a visual inspection of the one and two storey houses that surround the proposed development site provide a location that is very different to that envisaged by the development, and any "future urban context" has not been determined, but should recognise the substantial likelihood that it will reflect developments such as the Gables site on Pringle Avenue on the western boundary of the dog park.

In this context, it is useful to note that a substantial block across the road from the Gables development is also proposed for the same type of development - nothing like the major construction proposed for 28 Lockwood Avenue.

2. "...provides a sensitivity to its location and relative context".

It is impossible for us to accept that there is any sensitivity between the large scale development proposed and the surrounding family homes, on their traditional approximately quarter acre block. Further, sensitivity has not been demonstrated when considering the height of the surrounding family homes and even the height of the Glenrose Shopping Centre, north of the development site. In this context, by way of comparison, it is useful to note:

(a) the units and commercial development at 54 Glen Street. This development at the opposite (northern) end of the Glenrose Shopping Centre, has substantial underground parking, three business premises (currently a doctor's surgery and rehabilitation centres), plus 9 residential units. The developed footprint at 54 Glen Street is approximately half the development footprint available at the Lockwood Avenue site - given the essential need for a substantial setback from the service station. Using that development as a precedent, there should not be more than 18 residential units on the proposed development site. We understand the height at 54 Glen Street meets the current zoning requirement of 8.5 metres, that also applies to Lockwood Avenue;

(b) the Gables, an "over 55's" development on the corner of Pringle Avenue and Drew Place.

This development has a total of 6 dwellings, on a block of land with an equivalent construction footprint that should be available at Lockwood Avenue, with height limitations compatible with the surrounding housing; and

(c) the "Nursery" development at 32 Blackbutts Road (on the site of a former garden nursery).

Again with a similar construction footprint to that which should be available at Lockwood Avenue, has 6 adjoining townhouses, each of 2 storeys compatible with the surrounding housing in regard to height.

We note that these existing developments have 18.4% and 12.2% of the number of dwellings proposed by the developers. Factoring in the extra size of the proposed development site to reflect a useful comparison, that means a comparable number of dwellings would be up to - but certainly no more than - 36.8% or 24.4% of the number of dwellings currently proposed.

We note there has been some attempt to use the three-storey Northgate unit development on Warringah Road at Forestville as a precedent for approval. It is significant to note that the Forestville developments are located on a major arterial road and are located downhill from the Forestville shopping and community centre complexes and other housing, so that the built height of the residential construction has the advantage of allowing a visually acceptable height greater than that which surrounds the housing in the relatively level Lockwood Avenue precinct.

In addition, the Northgate development has the advantages of bus services that are at least three times more frequent than those servicing Lockwood Avenue, pedestrian traffic lights at either end of the block located at simple intersections and a pedestrian walkway over Warringah Road. Further, there are no busy roads to cross for pedestrian access to the shopping centre from the Northgate units.

Standard referred to - design and context

In the Report, we read that "*good design responds and contributes to its context*". This includes "*identifying the desirable elements of the areas existing character*".

Unfortunately, we are unable to identify any element of the design that reflects these statements.

It is our view that any attempt to claim that the Warringah LEP 2011 provides the appropriate criteria for approving this development, which should be no more than a

medium-level development, is inappropriate. There cannot be any laudable contribution to context, with a development application that admits the following:

1. It does not comply with all setback arrangements.
2. In a garden suburb environment - its publicly viewable landscaping is not going to be generous in height, admitted as being in order to avoid any material interference with the view, the building perimeter (one shrub) landscaping is minimal in depth and there appears to be a substantial loss of the current bushland/tree space in the South-eastern corner of the site.
3. The claim that "*The proposed development is compatible with the built form context of the site*" is unsound. This is in an environment where no similar residential developments exist on the surrounding sides and the nearest unit development is considerably less than half the density. This incompatibility is inferred in the "*Amended Statement of Environmental Impacts*" which, at 2.1, notes that "*the area is predominantly residential in character... (and)... characterised by a mixture of lower density residential development*".

Standard referred to - bulk and height appropriate to character

We note the statement that "*Good design achieves a size, bulk and height appropriate to the existing and desired future character of the street and surrounding buildings*".

Concerning the specific issue of height - WLEP 211, Zone B2 currently provides for a maximum height of 8.5 metres above ground. Given the nature of the surrounding housing, any opportunity to permit construction of partly up to 12.2 metres must be viewed as creating a substantially unacceptable visual impact. We note that even the Glenrose Shopping Centre height is only 11.64 metres at maximum height.

The size, bulk and height does not reflect the existing character of the street and surrounding buildings, and nothing has been publicly proposed or accepted as being "desirable" for the future character. Significantly, the developer has not responded to the local residents' concerns that, at least in part, resulted in earlier applications to Council being rejected. At page 11 in the Amended Statement of Environmental Impacts is the admission, "*Minor changes to the building form were also undertaken*".

The local residents have made it clear that community acceptance will only come with major changes to the proposed development's form.

It must be acknowledged that, since the developers purchased the property, three very significant future developments within the area have emerged that, separately and in the aggregate, will provide far more suitable substantial housing and commercial opportunities of the generic kind proposed by the developer for the Lockwood site.

They are:

1. the old "House With No Steps" site (now Aruma) on Blackbutts Road, Frenchs Forest, opposite the Lionel Watts Playing Fields - with its multiple low and medium density and over 55 residential development opportunities;
2. the Frenchs Forest High School site (Northern Beaches Hospital precinct), with its major multi-level and mixed use development opportunities proposed on Warringah Road, Frenchs Forest and
3. the Forestway Shopping Centre site, again with significant likely multi-level and mixed use development, near the corner of Forest Way and Warringah Road, Frenchs Forest.

It is not a matter of a "must" situation for the community or the Council, with its need to facilitate greater accommodation opportunities within the Council area, to have the Lockwood Avenue developer proceed as it currently now proposes on the Lockwood Avenue site. Any such current and future demand will be well catered for with the above 3 developments - all in far more appropriate locations.

On that basis alone, there is no need for the scale of this fourth, most unsuitable, proposed development.

The developers have overlooked that the only proposals that come anywhere near their proposed concept relate to the above listed Forestway Shopping Centre redevelopment proposal and the major centre proposed for the current Forest High School site.

It is therefore patently inappropriate to state that “*the bulk and height of the design proposed has been carefully considered to Belrose transition to a higher density area*”.

There is no proposal for the Belrose residential areas to transition to a “*higher density area*”.

As indicated above, the two major development proposals are quarantined towards the eastern end of the suburb of Frenchs Forest, kilometres away from the Lockwood Avenue site and notably located on major arterial roads, with significantly greater public transport opportunities.

To this point it is important not to forget that Belrose is NOT identified in the current NSW State Government’s Metropolitan Planning Strategy. This strategy has (only) identified the Frenchs Forest High School (Northern Beaches Hospital Precinct) site and the Brookvale/Dee Why Town centre/s as the priority for growth and increased dwelling densities.

It is unfortunate that the developer’s business model appears so dependent on the number of units. Having been refused approval with a proposal involving 51 units, the current proposed 49 units hardly reflects a “sensitivity” to the issues previously raised concerning the bulk of the building to accommodate so many units, in contrast to the character of the precinct.

Standard referred to - amenity for residents

It is noted that the developer indicates three storeys and 49 dwellings and claims that residential density is “sustainable”.

Unfortunately, no explanation or evidence has been provided to support this significant statement. We also note the discussion on “amenities” was presented later in the document and provide comment below.

Standard referred to - sustainability - solar access

We note the claim that 71% of the units will receive 2 hours of solar access during winter, which we assume means “sunlight”. That means nearly a third of the 49 units will not meet this minimum standard. This issue attracts even greater concern, with the revelation in Table 1 that 15% (8 of the 49 units) will not receive any sun during winter.

Given the context of the development is a “sunny” suburban environment, it is hard to accept that such low scores reflect the living environment enjoyed by all the other residents in the precinct.

Standard referred to - good design and landscaping

We note the comment that landscaping will “*wrap around the building at street level... providing a visual buffer*”.

This statement is difficult to accept when the setbacks and the illustrations of what is proposed indicate a perimeter planting of one bush/plant density between the exterior boundary and the building. This concern for the paucity of planting is supported when, later in the document, one reads that the aim is to have low shrubbery, to promote what is apparently security motivated views to and from the building.

Further, in Table 1 the statement that 25% of the site size will constitute landscaping is provided with the stipulation that it will be split on two levels, with none visible from the street level and 50% of that open space will receive less than 2 hours sunlight in winter.

To the extent that there may be an exception to landscaping that is simply around the immediate perimeter, in Table 1 there is mention that 10.5% of the site will be a deep soil

zone. It is our view that such a small proportion inadequately reflects the requirement to preserve the trees in the south eastern corner of the site, adjacent to the service station.

We understand that this preservation is mandatory, because there are threatened species involved and we are conscious of the area providing habitat for possums, bandicoots and echidna. The fact that the developers have already facilitated the destruction of one of the trees without permission, does not take away from the need to protect what is left.

Further, it might be appropriate for Council to seek independent arborist advice before accepting any current opinion, or concluding that the existing trees on that area of the site are not worth preserving and should be replaced with developer convenient species.

Standard referred to - ventilation

Given the standard of living enjoyed in the surrounding areas at present, and in an environment of greater concern for energy efficiency, it is deeply disturbing to read that only 63% of the units will have the advantage of cross-ventilation.

In our opinion, it is most unfortunate that the developer does not appear to have presented an analysis of what this means for air quality and potentially dangerous CO2 levels.

Standard NOT referred to - boundary safety

In our opinion, it is not unreasonable for the Council to seek an extension of this open space, providing a substantial corridor along the site's boundary with the service station not only for habitat, but also for safety reasons. It should not be overlooked that, when Council built the original library, the major existing corridor of trees into grassland to the northern end of the site was adopted for that very reason.

It is inappropriate to encourage high density development immediately next door to a busy service station with constant deliveries of fuel, held in substantial storage facilities that, in part, are above the ground level of the development site.

The need for a considerable setback from the boundary of the service station must be recognised. We are certain the NSW Fire and Rescue Service would be pleased to provide you with objective detail as to what would happen if that service station was to be threatened by a fire.

Parking

We are particularly concerned at what we regard as parking "spillage", due to the standards the developer is proposing in regard to residential car parking.

Any attempted or implied claim in Table 1 - that WPCP 2011 car parking requirements have been met and that they could possibly be applicable, with what appears to be stated as 0.5 spaces for the 1 bedroom unit, 0.5 spaces for the 2 bedroom units and 1.2 spaces for the 3 bedroom units and that these numbers will be suitable for the residents and the community generally - must not be accepted by the Council.

Living in an environment where 2 and 3 vehicles per household is the norm, and visitors generally travel by car to visit from out of the area, we are astounded with the unrealistic detail provided in the "*Traffic and Parking Impact Assessment of Mixed Use Development*".

A development with residences having a total of 112 bedrooms is expected to be accommodated by 69 residential car spaces (1.6 bedrooms per car space and 1.4 car spaces per unit). 49 separate families are expected to generate the need, at any peak time, for no more than 10 visitors' vehicle parking spaces.

The expected prices for the units will ensure multi-vehicle families will be those purchasing, whether couples or couples with children. One only vehicle households are very rare in the precinct and the Australian Bureau of Statistics figure quoted below supports this observation. The proposed development will generate the need for street parking that is just not available in reasonable walking distance.

We do not have any confidence in the statement included in the report - "*The proposed development provides all parking on site*". We cannot accept this for residents, nor for retail shoppers and staff parking, and we discuss this issue in detail below.

The issue of adequate parking is critical and the following highlights why there cannot be any dependence on surrounding street car parking to facilitate the parking of residents' excess vehicles, visitors vehicles and service and delivery vehicles. Nor can there be such dependence for the proposed retail precinct-generated requirement for car parking.

As we discuss below, the unique environment demands that all parking requirements generated by the finally approved development must be met on site.

Excess vehicles associated with the development site cannot use the shopping centre car parking facilities, or the nearby car parks associated with the Council Library/Glen street Theatre/Energise Gym complex, to supplement the currently inadequate proposed on-site parking. These car parks are fully utilised by the public at many significant times during an average week, for the purposes for which they were constructed.

Further, the Council has always expected the 2 car parks adjacent to the library/theatre complex to be supplemented by the Glenrose Shopping centre car parks at peak periods of the complex's usage. In other words, as part of the consent for the Glenrose Shopping Centre, the developers had to provide continuing access to their car parks for overflow parking for the complex at peak times.

That Council assessment means there is no spare capacity for these car parks to supplement the inadequate residential car parking at the proposed development site, at least during peak complex use periods. This period generally being at night, with full house theatre performances and the gym at full after-work capacity, when maximum amounts of parking will also be required for the proposed development's unit dwellers - also home from work and/or preparing for an evening at home. This demand could also be increased due to the proposed development's inadequate retail shopper parking issues discussed later in this submission.

All this demands a very careful analysis of the current on-street parking opportunities, which we provide below.

In the immediate vicinity of the proposed development, within convenient walking distance that visitors, service people, delivery people and tradespeople would expect, there are just 7 street car spaces.

This limited number does not accommodate 2 vehicles per dwelling, 1 visitor vehicle per dwelling, 2 staff vehicles per commercial space, plus any further space for retail customers to the site, that must be considered as necessary. We cannot accept that the extra requirement for visitor parking should be limited to 1 vehicle for every 15 units, where there are 70 units. In a development proposed to include 49 units, more car spaces must be allocated for the residents and for visitors to those dwellings.

The most recent relevant statistics held by the Australian Bureau of Statistics (2016 study), reveals that 66% of households in Frenchs Forest have 2 or more vehicles. There are no indicators that we could discover that the type of resident who will live in the proposed development, according to personal lifestyle, will be markedly different from folk already living in the area.

On that presumption, there will be at least 32 unit families with 2 or more vehicles. That is at least 64 of the car spaces required out of the total of 69 allocated. We can expect almost all the remaining 17 units to have one vehicle. On this simple analysis, at least 12 resident's vehicles will have nowhere to park on site.

That's without making any allowance for the 3 car families living in the proposed units.

We have no doubt that the exception/s to all 17 "other" unit families having at least one car will be made up and more by the portion of the 66% of unit households which will have 3 vehicles to park.

Fundamental to this concern is the following indicators of limited off-site parking, with on-site parking opportunities being inadequate. These indicators include:

1. The general precinct within 4 blocks in any direction - except that encompassing the Glenrose Shopping Centre and the Council Library/Glen Street Theatre/Energize Gym complex - with three exceptions, the housing surrounding the proposed development are 1960s vintage, with driveways and garages built to accommodate one vehicle per household. This encourages comprehensive parking of second household vehicles (common to almost all households and, on street appearance, well above the 66% ABS figure for 2 or more cars per residence), as well as live in teenager and adult children's vehicles (a growing number) in the streets.

2. The number of home businesses in the immediate area encouraging visiting vehicles.

Across the road from the proposed development, in the Peacock Pde/Beckman Pde precinct there are 26 houses comprising at least 7 home-based businesses, many of which generate delivery van and client visits from time to time, as well as at least 2 church affiliated charity offices or support locations.

From time to time, some of these home businesses require parking opportunities in the section of Peacock Pde where parking is limited by the corner with Lockwood Avenue, 4 driveways and dangerous parking opportunities on the Western side of Peacock Parade, because the street is too narrow to safely accommodate vehicles parked on both sides of the road - particularly as you approach the intersection with Lockwood Avenue.

3. Immediately in front of the proposed development on the northern side of Lockwood Avenue, alongside the bus stop and intersection with Glen Street on the BP/Woolworths service station corner, there are just 3 vehicle spaces. During business hours, these spaces are always occupied. Arguably, this area should already be included in a "no stopping" prohibition, given the proximity of the bus stop, with buses pulling out, the pedestrian crossing and the very busy Glen Street corner.
4. Immediately in front of the proposed development on the southern side of Lockwood Avenue between Blackbutts Road, Glen Street and Peacock Pde, there is a lane which follows onto private driveways to the east of the Frenchs Forest Dentist building, the driveway entrance to parking on the dentist's property and the Lockwood Avenue pedestrian crossing. In this section there is only parking for 2 cars. There is already frequent illegal parking too close to the Lockwood Avenue/Peacock Street corner.
5. Parking availability in Lockwood Avenue on the southern side to the west of the Peacock Street intersection compromises a bus stop, numerous driveways and the fact that, half the block down, when parking opportunities may have been expected, it is opposite the busy St Stephen's Church Office building and then the Church itself.

It is unfortunate that the "*Traffic and Parking Impact Assessment...*" report failed to acknowledge the existence of St Stephens' Church and its Church Office, as near neighbours to the proposed development.

6. It is also unfortunate that this report acknowledged the removal of the 2 disabled car parking spaces in Glenrose Place, but was unable to suggest how this deficiency may be made up with alternative arrangements.

Will disabled drivers or passengers who currently use the parking opportunity in Glenrose Place have access to the 4 disabled car spaces in the proposed development's underground car park, which are implied as being offered for shoppers visiting the development site's proposed retail area?

7. Parking to the west in Lockwood Ave, on the northern (development) side after the bus stop, compromises the 6 housing driveways and the proximity of St Stephen's Church Office and the Church. There appears to be 8 spaces. Observation over a week, during 24 hour periods, there were at least 3 vehicles parked in this area. When major Church activities are being conducted, all spaces are occupied.

8. There is no parking allowed on the western side of Glen St from the front of service station, past the busy bus stop, to the northern end of the Glenrose Shopping Centre. At that northern end, the several spaces in front of the home unit/medical service building are almost always occupied.
9. On the eastern side of Glen Street, parking opportunities are compromised by the bus stop opposite the shopping centre, substantial no stopping/parking signage and the entrances to the Glen Street Theatre/Energize Gym/Council Library complex with its limited, always busy car parks. There appears to be 6 spaces available in front of the library which are near the library main doors and, pre-COVID, were frequently used by disabled drivers/passengers and return book deliverers entering the library.
10. Expecting the residents to utilise the 44 general spaces plus 3 disabled parking spaces in front of the theatre, at the Glen Street Theatre/Energize Gym/Council Library complex, cannot be contemplated by the developers. Apart from being a community facility and not intended to be a subsidy for an out-of-town developer, in non-COVID peak periods this facility, so near the proposed development, is frequently full.
11. Similarly, utilisation of the much smaller car park at the rear of the Glen street theatre stage cannot be expected, or allowed to occur. This parking, with only 36 spaces and its narrow 2 way entrance/exit, is particularly popular with folk using the Lionel Watts Sports Fields and the Lionel Watts Community Centre and is almost always full during Theatre productions, peak sports events and training times. It is also an important facility for the staff and the trucks that deliver staging and props to the Glen Street Theatre for the various productions.
12. Utilising the 519 space Glenrose Shopping Centre car parks is also unacceptable. Apart from commercial issues of the Centre ownership not providing shareholder-owned assets to subsidise a private developer who, in part, is intending to compete for retail tenants, there is the issue of near full capacity usage during the various non-COVID shopping weeks. Further, why should the Glenrose Shopping Centre security services have to supervise vehicles from the proposed development, being parked in the Glenrose Shopping Centre car parks overnight?
13. Although a substantial walking distance from the proposed development both sides of Glen Street from the northern end of the Glenrose Shopping Centre to the roundabout at the Pringle Avenue end of the dog park (identified by the developer as offering parking opportunities) offer limited parking opportunities for substantial parts of each day. This is due to the houses along the street parking their second and third vehicles, plus the parking for those visiting the Lionel Watts Playing Fields. Observations during the after school daylight hours during the week, and most daylight hours of the weekends, indicate frequent - almost total - "park-outs" on the playing fields' side of the road and limited opportunity for parking on the residential side notwithstanding that, in reality, the street is too narrow for comfortable, safe parking on both sides - particularly given that it is a significant bus route both ways.
An indication that there has been some Parking Committee recognition of the narrowness is the signage that prohibits trucks from turning out of Glenrose Place and north towards this area of Glen Street.
The "*Traffic and Parking Impact Assessment...*" report mentions this street area, but fails to mention the extent of the parking along both sides of this section of Glen Street indicated above, or the length of the walk back to the proposed development.
14. The northern side of the proposed development, in Glenrose Place, only 2 parking spaces are currently provided, which are allocated for disabled parking. There is no opportunity for any other legal parking in this busy access to both the Glenrose Shopping Centre lower level (B1) and ground level car parks and to Woolworths' major delivery bay, for the semi-trailers that deliver at all hours of the day and night.
15. Should the unit residents or shoppers consider parking in Ashworth Ave, which is a cul de sac blocked off from Glenrose Place and which can only be entered via Hakea

Ave considerably to the west of the proposed development, they will find it a challenge. Although within walking distance of the proposed Lockwood Avenue development, parking is compromised by the turning circle of the Ashworth Avenue cul de sac, the existence of Ashworth Reserve, plus the largely 1960s housing that was built with an anticipated one vehicle per household, which has resulted in second and third vehicles from those households being regularly parked in the street.

It is our view that more transparency is required in the developers' communications with Council. The current proposed development will mean it will be unavoidable that the Glenrose Shopping Centre will be providing a significant amount of parking for the development.

The only other method of increasing car space in the current development is that adopted in a number of home unit blocks in Dee Why - the installation of car stackers in the proposed development's vehicle parking basement - however this would mean an unacceptable height increase in the building to accommodate the 2 vehicle stackers.

Traffic - the intersection

The proposed development site fronts Lockwood Avenue at the intersection of Glen Street and with an adjacent intersection with Blackbutts Road. This double intersection is particularly busy in the business peak hours and school peak periods. The critical traffic studies must recognise the considerable volume of traffic, the complexity of the intersection, the visual distractions associated with the intersection and the lack of traffic lights that characterises this double intersection.

Any traffic counts must reflect non-lockdown COVI 19 "normal" activity. We are not confident that the counts referred to by the developer have been taken at such times.

We note the content of the Traffic and Parking Assessment of Mixed Use Development report with concern in this regard.

The focus of this report was on congestion. Vehicle volumes and driver/passenger safety appeared not to have been appropriately considered.

Asserting "*minimum delays and additional capacity*", without the expansion of vehicle numbers and what appears to be the maintenance of saturation rates of between 22% and 34%, means the report fails to comment on the dynamics of the intersection.

Visual observation of traffic movements in the complex possible 6-way environment, plus the visual distraction of buses leaving bus stops and the busy petrol station, plus constant exits from the Glen Street Theatre/Library/Energize Gym complex car park (including its 2 very popular traffic generating coffee shops - both open when the other facilities are open), indicates a high dependence on very alert and safe driving. Experience driving through the intersection reveals frequent near misses.

Unless travelling to the north, all vehicles parked at or visiting the proposed development will have to pass through part or all of this complex intersection. Those vehicles travelling north will enter one of the roads making up this complex intersection - just 70 metres from the intersection as they turn from Glenrose Place.

Those vehicles travelling north will enter one of the roads making up this complex intersection - just 60 metres from the intersection.

The complexity of the intersection means it is not suitable for a roundabout and any increase in traffic through this intersection must result in the installation of a complex set of multi-traffic lights. Nothing of this nature has been discussed.

Traffic - Glenrose Place

We note with interest the estimates of vehicle movements in and out of the proposed development, included in Table 5, "*Estimated Traffic Generation*" in the "*Traffic and Parking Impact Assessment...*" report. These express confidence that Glenrose Place will be able to accommodate the various levels of vehicle movements in and out of the proposed development.

However, we ask Council's Traffic Committee to consider the following toxic mix during the peak Saturday period in Glenrose Place:

1. The Glenrose Place pedestrian crossing is expected to double in use.
2. 144 vehicles are estimated to be moving out of the proposed development at a peak time.
3. 144 vehicles are estimated to be moving into the proposed development at a peak time.
4. The shopping centre underground car park in dynamic use (post-COVID), with its major entrance/exit off Glenrose Place.
5. The upper level shopping centre car park, with one of its 3 major entrance/exits just above the other car park entrance/exit.
6. The Australia post-boxes being at the Glenrose Place end of this car park, with 24 hour access for box renters.
7. The 24 hour access to the bottle and can recycling facility next to the Glenrose Place entrance to this car park.
8. Semi-trailers delivering to Woolworth's loading dock, both waiting on the southern side for their turn, and turning in and out of the Woolworths loading bays.
9. The installation of a proposed roundabout at the cul-de-sac end absolutely adjacent to the shopping centre car park entrance, which will provide a major obstacle for the semi-trailers delivering to Woolworths. Further all vehicles leaving the proposed development will have to navigate vehicles heading straight for them as the vehicles exit the lower level (B1) shopping centre car park.
10. The developer states there will be an estimated 157 movements in and out of the proposed development site during the evening peak. Even this lower figure than the 144 peak multiplied by 2 other peak time movements, is significant when you stand and watch the activity in Glenrose Place at that time.

Pedestrian connection

The current public pedestrian walkway alongside the western side of the proposed development site appears to have been abandoned, in an attempt to make people walk through the development on the ground floor retail area.

The pedestrian connection between Lockwood Avenue and Glenrose Place should be mandatory for any development. It appears most unfortunate that the Council has sold the land without a public easement to that effect.

There are now no "*pedestrian connections*" providing efficient and safe connections from the residential areas to the south and west of the site, specifically to Glenrose Village Shopping Centre and to a lesser extent the Glen Street "Cultural Hub", that do not involve being forced to walk through the new proposal and its "*central public square*", or past the busy service station entrance/exit.

We make this deduction from the site plans, where the developer has not mention any maintenance of the existing corridor.

For a safe environment for the many school children and elderly residents who previously used the public pathways through the 28 Lockwood Avenue site, including little children and parents accessing the pre-school facility that is one of the western neighbours to the proposed development site, the 2 entrances/exits to the busy service station, plus accessing Glenrose Place adjacent to the pedestrian crossing, should be considered essential and not inaccessible by having to enter a complex that may be of no interest to the pedestrian.

Pedestrians not wanting to pass through the development's retail shops, or who are denied entry if after hours security gates/doors are in place - which will be important to deter vandalism - along and pass the service station. Given the frequency of vehicles

accessing the long established service station from early morning to late at night, and the entrance/exit to the Glen Street Theatre/Energize Gym/Council Library complex car park, an increase in pedestrian traffic could present an unacceptable safety risk.

The safety issues associated with the very busy service station cannot be overlooked. There is now no immediate geographically situated competition, with the nearest alternatives being on very busy arterial roads and many generally being on the 'wrong side' of the road for convenient access. Contributing to this dynamic is the fact that the service station is open from 7 a.m. to 11 p.m., Monday to Saturday, and 7 a.m. to 10 p.m. Sundays.

As an indication as to how busy the service station can be - it has 6 pump bays and, during peak morning and afternoon hours, it is not uncommon for up to 4 vehicles to be waiting their turn to drive to the petrol pumps. This is even more noticeable when petrol prices dip.

This is also the critical safety issue of passing the service station and continuing to walk on the footpath in front of the Glenrose Shopping Centre - the opportunity to use a pedestrian crossing is left to half way down Glenrose Place. In other words, pedestrians intent on walking north cross at the busy intersection of Glen Street and Glenrose Place, with vehicle drivers turning left from Glenrose distracted by other vehicles turning in and out of Glenrose place, service station exit/entry activity, Glen Street Theatre/Energize Gym/Library complex front car park exit/entry activity and the complex intersection just 70 metres up the road.

This means extra pedestrian traffic created by the loss of the public easement pathway on the western side of the proposed development site, after passing the busy entrance to the service station, will be more likely to cross at the intersection of Glen Street and Glenrose Place, when heading to the crossing in front of the Glen Street Theatre/Energize Gym/Council Library complex, or to the bus stops on either side of Glen Street, or to the Glenrose Shopping Centre major entrance.

Proposed retail opportunities.

We note that some 3,323 square metres are being allocated to tenanted retail use on the ground floor of the proposed development. While we could not discover any information on the subdivision of this space, this must be considered a considerable sized development feature in the light of the 163 car parking spaces being allocated for retail parking and the comparative size of shop floor areas at the 2 existing nearby major shopping centres.

Obviously, the developer would hope that the retailers around the proposed central public square will be dense in number and diverse. This density must be critically considered from at least 2 perspectives.

First, the commercial realities. Secondly, the information on parking provided.

The writers are not in a position to obtain all the information that would support a definitive assessment of their concerns. However, we present the following as "thought starters" for Council consideration and certainly as support for further information to be demanded from the developers of the proposed development, to encourage an informed application decision from Council, or on the part of the Land and Environment Court.

Retail density

One of the writers has had considerable experience as a management and marketing consultant to retailers and the following comments are offered to Council for consideration.

We note that some 3,323 square metres are being allocated to tenantable retail use on the ground floor. The description used by the developers implies that, if all successfully let, this could be the actual aggregated size of all the shops, net of general walking areas, delivery and service corridors, public toilets, etc.

There has been no mention by the developer as to the possibility that a supermarket chain might be approached to be a tenant. Given the dynamics of the proposed building, the limited parking (see discussion following) and the commercial dominance of the more favourably located local Woolworths and Aldi stores, we presume that such a major tenant will not be attracted to the development.

Coles, with its dominating, one only supermarket site at nearby Forestville, seeks larger spaces in larger centres and did not proceed to indicate interest in participating in the Glenrose development. In our opinion, it would be very unlikely that Coles would be interested in the Lockwood Avenue location.

In our view, the most the developer could hope for (but not expect) is an IGA franchise establishment of similar size to that of the long established supermarket situated 2.1 kilometres to the north, located in the Belrose Village Shopping Centre in Ralston Avenue, Belrose. That establishment occupies approximately 600 square metres of retail space, which is equivalent to (say) 8 smaller retail opportunities in the proposed development.

The location of the development site so close to the successfully long established Glenrose Shopping Centre, the history of tenant vacancy rates at Glenrose and at the Forestway Shopping Centre, just 2.1 kilometres away, plus the existing IGA outlet in the general area and the parking issues discussed below, are not encouraging for either the recruitment of a supermarket tenant of any size or, in any event, any successful retail precinct to be established on the development site.

There can be no assertion of a contribution to community amenity when there is a high likelihood that the substantial retail area proposed will not be commercially viable.

As the closed shops in other suburban and country precincts demonstrate - particularly with the likelihood of the pandemic continuing for some time, a failed (in whole or part) shopping centre precinct is depressing, discourages further attempts at enterprise in the area, looks unsightly, attracts vandalism and degrades the general area. Further, what is left of the original retailers cannibalise the trade of the more successful nearby centres, and some shops in those centres are left marginalised and threatened with closure.

We accept that the financial risk lies with the developer and the retailers foolish enough to be involved. However, a Council that permits overdevelopment of retail opportunities does not serve its community well. It also fails to recognise the appropriate level of sensitivity to community amenity so clearly demonstrated with the attractive - and obviously more commercially realistic - development of the Glenrose Shopping Centre site.

Our community does not have any interest in watching small business retailers lose their life savings, nor does the community care to risk the possibility of slum like conditions, as described immediately above, developing in our midst.

In our view, the developer must be confronted with the following realities.

1. As residents living one block from the proposed development, in constant contact with our near neighbours and with an interest in such issues created over a period of 20 plus years as marketing and business consultants, we are confident in asserting that the developer has not made any effort to research local interest in their retail facility provision plans.
2. Smaller retail opportunities located any meaningful walking distance from major supermarket developments, but still in the same general precinct, tend to struggle with marginal and constantly closing business involvement. The history of ribbon/high street retailers in places such as St Mary's and Penrith, with major supermarket developments occurring 2 or more blocks away, are sad examples of this. Closer to home, observation of what has happened on Pittwater Road at both Narrabeen and Mona Vale, over the last 30 years, is important to consider.
3. Even the history of the well planned Glenrose Shopping Centre, with its 2 major supermarket chain operators attracting the bulk of shoppers (an advantage the

proposed development will not have), reveals at least one retail space vacancy and/or one “pop up” temporary shop at any one time. In short, this history reveals that finite retail capacity in the immediate general precinct has been reached.

4. There is a major redevelopment of the Forestway Shopping Centre planned, just a 2.1 kilometre drive from the proposed development in Lockwood Avenue. Given the anticipated continuing involvement of both Woolworths and Aldi as tenants, plus new and attractive retail space, without the immediate competition of the Glenrose Shopping Centre, this near future redevelopment on a site that - for decades - has been a successful shopping precinct serving a much broader geographic area than the Lockwood Rd development site, must be considered direct and powerful competition for speciality retailer participation in the proposed Lockwood Avenue development.

It appears likely that this Forestway redevelopment’s completion could be sooner than that of the Lockwood Ave development’s completion and the developer of the latter could be faced with attempting to attract retail tenants at the same time as the relatively near major retail hub is also looking for tenants.

5. Notwithstanding the overall successful history of Forestway it cannot be overlooked that, in recent years, at least 2 retail spaces in that building have been vacant for lengthy periods and there has been a noticeable level of turnover regarding at least 3 other retail spaces. It is accepted that the uncertainties associated with the redevelopment timetable may have contributed to this, but this may also be a sign of retail space already exceeding demand in the general area.
6. Further evidence of oversupply can be seen with the mixed purpose building at 54 Glen Street, the north-eastern neighbour of the Glenrose Shopping Centre. Both the street level and the mid-way underground retail space adjacent to the doctors’ surgery have experienced many months of vacancy in the last 3 years.

There can be no doubt that any retail facility provision in the proposed development will considerably exceed viable commercial capacity in the general area.

Retail parking

To recap - 163 spaces have been allocated for retail parking and, as also indicated above, the proposal is for 3,323 square metres of gross tenantable retail floor area.

While we do not have the capacity to provide definitive calculations, we ask Council to consider the following as “thought starters” requiring robust further enquiry of the developer and much closer analysis than it appears the developer has undertaken to date.

We note the following for indicative purposes:

1. The specialty shop floor spaces (excluding the aisle kiosk-type opportunities) in the Glenrose Shopping Centre vary from 25 square metres to 81 square metres. If tenant allocation was similar to the smaller shops in the Glenrose Centre, each could have an approximately 35 square metre floor space, given floor space allocation in Glenrose ranges from 25 to 35, 54, 75 and 81 square metres floor space. On that assumption, there could be approximately 90 retailers in the proposed development.

However, for this analysis we are going to presume 75 square metres is an “average” acceptable size and of reasonable commercial attractiveness for the general area. Notwithstanding that this size appears bigger than many of the Glenrose spaces, appears to exceed many of the spaces at Forestway and favours the position of the developer in our calculations (if we allowed for more shops, there would be greater staff numbers for which to provide parking).

2. Glenrose has staff-only parking in the basement (B2) car park of 39 spaces, so the 519 spaces in the underneath (B1) and street level car parks are primarily for shoppers. The Lockwood proposal has no specified segregated retailer staff parking.

Staff and shoppers will be forced to share in the use of the Lockwood development's public parking.

3. Our observations indicate on average at least 2 staff per specialty shop space in the Glenrose Shopping Centre. With some 33 retail spaces, that means at least 66 staff at any one time will require parking. We are comfortable presuming most travel to work by car, because the great majority we have talked to over the years do not live within walking distance of their employment.

Allowing for the 27 staff from the specialty shops and the maximum of 20 odd staff on duty during major shopping periods at the 2 supermarkets, who may park in the car park shared with shoppers, there could still be 472 spaces in the public car parking areas available at Glenrose.

4. Given our generous allocation of floor space to each retailer's shop in the proposed development means there will be approximately 44 specialty retail spaces in the proposed development, minus any supermarket tenant, some 88 car spaces will be required for staff in any realistic building plan.

Sharing the public/shopper car parking means that just 81 car spaces, at most, will be available to the public.

If the developer attracts a supermarket chain as a tenant, the dynamics of potentially larger volumes of shopper vehicle parking requirements at peak periods, even with some possible reduction in aggregate staff numbers, makes the results of such an analysis far worse in regard to shopper parking capacity.

Even with the limitations of the above indicative analysis, it is clear that there is a serious question as to the adequacy of retail shopper parking associated with the current development proposal.

That means the developer must address the indicative concerns raised above and explain the make up of the intended retail, the most likely staff parking required, whether or not there staff parking will be quarantined from shopper parking, and how any balance of car parking spaces will satisfy the developer's presumed success with its planned retail precinct. Without satisfactory explanations, there can be no confidence in the developer's statement that all parking required will be accommodated on site.

Given the parking dynamics of the area outlined above, no development should be approved for the Lockwood site that cannot fully satisfy the parking demands of the unit dwellers, their visitors, service and delivery vehicles, visiting tradespersons, shoppers and retail shop staff on site.

Conclusion

The character of the general area supports medium density development at a level far below the concept that has been presented to the Council.

On the basis of the information available to the general public, the developer has not succeeded in presenting a convincing argument for any increase in permitted building heights, or for the construction of a multi-unit/retail mix complex of such dominating bulk and with such limited parking allocation, that is highly likely to be generated at 28 Lockwood Avenue, Belrose.

Phillip Smiles and Lyn Turner