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**Sent:** 13/09/2021 1:25:33 PM  
**Subject:** Proposed Development DA2020/0393  
**Attachments:** 4081\_001.pdf;

Att: Tony Collier

Dear Tony,

We have previously provided a submission on the proposed development DA2020/0393 and for reference we re-submit our submission

Jeremy

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10<sup>th</sup> September 2021

The General Manager  
Northern Beaches Council  
PO Box 82  
Manly NSW 1655

**Attention: Tony Collier**

**RE: PLANNING SUBMISSION IN RELATION TO DA2020/0393 FOR A SHOP TOP HOUSING DEVELOPMENT COMPRISING RETAIL PREMISES, GYM, 51 DWELLINGS, BASEMENT CAR PARKING AND LANDSCAPING AT 28 LOCKWOOD AVE, BELROSE**

Dear Council,

This Planning Submission has been prepared by GVSC Pty Ltd, in relation to DA2020/0393 for a shop top housing development comprising retail premises, gym, 51 dwellings, basement car parking and landscaping at 28 Lockwood Ave, Belrose.

It is noted that the formal exhibition period for the Development Application (DA) ended on 29 May 2020, however based on discussion with Council it is understood that given the extenuating circumstances this Submission would be considered.

GVSC Pty Ltd own and operate the Glenrose Village Shopping Centre a 56-58 Glen Street, Belrose, which is situated directly north-east of the DA site. Glenrose Village is anchored by Woolworths and Aldi supermarkets and also includes a comprehensive offering of fresh food, cafes, restaurants, health and fitness, other services and specialty stores.

GVSC Pty Ltd do not object in principle to the future redevelopment of the site, but do have a number of concerns with the current DA. Specifically, the following objections are raised:

- The economic impacts of the proposal have not been adequately considered. It is anticipated that the quota of retail floor space may compromise the viability of existing centres and undermine the local retail hierarchy.
- The extent of retail frontages, and internalization and undergrounding of retail space, would detract from the vibrancy and vitality of the established centre and public domain.
- The height and density of the proposal are excessive and represent an overdevelopment of the site.

- Together, the significant influx of commercial floor space and unprecedented density of development in this location would threaten the local character.
- The proposal may result in unacceptable traffic impacts.

It is requested that these matters are addressed through the procurement of additional information and amendment of the proposal, prior to the determination of DA2020/0393.

Should you wish to discuss the matter further, please do not hesitate to contact Willowtree Planning.

Yours faithfully,



JEREMY WALKER

GVSC Pty Ltd  
Director

## **1. ECONOMIC IMPACT ON EXISTING CENTRES AND LOCAL RETAIL HIERARCHY**

The proposal would introduce a significant amount of new commercial floor space on the site, including 4,035m<sup>2</sup> retail Gross Floor Area (GFA) plus 992m<sup>2</sup> GFA for a gym. This represents a 100% increase of commercial floor space on the site (noting the historic community use for a library and publicly-accessible open space).

The injection of 5,027m<sup>2</sup> commercial floor space (including the retail and gym) is considered excessive given the small scale, 'village' character and community-focus of the local centre. It is noteworthy that in the Northern Beaches Council's Local Strategic Planning Statement (LSPS), Belrose is described as a forest village' intended to provide day-today access to goods and services. The large scale of the proposed development would be incongruous with this role.

The excessiveness of the proposed commercial quota is further demonstrated in the context of the previous Planning Proposal for the site (now withdrawn). Planning Proposal PEX2017/0007 considered a 0.5:1 Floor Space Ratio (FSR) for commercial premises. The 5,027m<sup>2</sup> commercial floor space proposed by the current DA represents a 0.94:1 FSR. As such, the DA is proposing to introduce 2,366m<sup>2</sup> and 89% more GFA than Council has previously contemplated.

It is considered that the quota of commercial floor space on the site may prompt a shift in the role of the centre to one which draws customers from a wider catchment. By drawing people away from their own local centres and regional centres, the proposal may challenge the local and regional hierarchy and compromise the role, function and viability of other centres within the region. This would be inconsistent with the District Plan which states that the *hierarchy of local, strategic and metropolitan centres (including transport interchanges) should be informed by an evidence-based assessment of local and district-wide housing, employment, retail, commercial services and infrastructure demand.*

Such an outcome would also exacerbate environmental impacts for the Belrose local centre itself, particularly associated with the generation of extra traffic and demand for additional car parking as customers travel from further afield to access the centre. This would result in a car-focused centre, contrary to the stated objectives of the DA which instead emphasise the importance of a pedestrian-focused environment. Similarly, the LSPS and District Plan promote walkable, pedestrian-focused local centres, which would fail to be achieved by introducing such a quota of commercial space within Belrose that it serves a wider, car-based catchment.

Despite these potentially severe consequences, the DA has not considered the economic impacts of the proposed development. Whilst it is acknowledged that the current B2 Local Centre zone already permits retail premises, given that the height, and thereby density, of the development exceeds what would have been anticipated for the site based on the current WLEP2011 standards, further assessment of the associated economic impacts is required. It is requested that an Economic Impact Assessment is prepared, and exhibited for review and comment, prior to the completion of the assessment for DA2020/0393.

## **2. ADVERSE IMPACT OF OVER-EXTENDED, INTERNALIZED AND UNDERGROUNDED RETAIL FRONTAGES**

The proposal introduces an extensive network of retail frontages adjacent to *all* street frontages as well as internalized within the site. A significant amount of commercial space is also located underground (including three (3) levels of below-ground retail/gym adjacent to the Lockwood Avenue frontage).

This would divert activity and investment *away* from the established local centre and ‘activated’ streets. By reducing pedestrian and retailing activity in the existing centre and public domain, the proposal would threaten the vibrancy and vitality of the local area.

In particular, the undergrounding and internalising of significant amounts of commercial space would fail to offer *any* contribution to the public domain or vibrancy of the centre. As such, the underground and internal commercial spaces would forgo their otherwise potential contribution to the ‘life’ of the centre.

Further to the above, Lockwood Avenue and Ashworth Avenue currently exhibit residential characters and roles, which would be compromised by the introduction of shopfronts. This shift in the character and role of Belrose is not reflected in the DCP Character Statement or LSPS.

By contrast, Glenrose Place serves a ‘functional’ role for the adjoining Glenrose Village Shopping Centre, comprising back-of-house service areas, loading zones and car park entries. Glenrose Place is not intended to function as a ‘main street’ and therefore is not suitable for activation. Rather, the focus of pedestrian activity should be along the established ‘main street’ framed by Glenrose Village, Glen Street Cultural Hub and library, Glen Street theatre and Lionel Watts park and sportsground.

Therefore, it is considered that the extent of retail frontages should be reduced and that all underground commercial floor space should be removed, to avoid unacceptably impacting the established centre and public domain.

### **3. EXCESSIVE HEIGHT AND DENSITY RESULTING IN OVERDEVELOPMENT OF THE SITE**

The proposed development includes a building height up to 12.42m, representing a significant 46.12% breach of the 8.5m height standard provided by WLEP2011. The extent of this non-compliance severely deviates from Planning best-practice (which considers a *maximum* variation of 10%).

Although the submitted Statement of Environmental Effects (SEE), Clause 4.6 Variation Request and other DA documentation attribute the height non-compliance to a lift overrun, it is noteworthy that the non-compliance actually relates to an entire additional storey consisting of habitable yield as well as to the lift overrun atop the additional storey.

Such a significant extent of breach, particularly as it is for habitable yield, represents an unacceptable overdevelopment of the site.

Further, the Clause 4.6 Variation Request and other DA Documentation seek to justify the non-compliance by stating that it 'appears as a recessed third storey'. The submitted Elevations and Photomontages however demonstrate that the third storey will be clearly visible in the streetscape, whilst from the perspective of the proposed public plaza the development will appear as a four (4) storey building. Whilst the DA describes the development as 'complementing and enhancing the current character of the local centre', it is queried how a development that presents as a three (3) to four (4) storey form could be 'comparable' (as maintained by the DA) to the surrounding single and double storey detached dwelling houses or even to the existing single storey Glenrose Village Shopping Centre.

It is also noteworthy that the previous Planning Proposal (PEX2017/0007) sought to increase the building height on the site to 9-15m, but was then withdrawn. This alludes to the need for a Planning Proposal, supported by detailed modelling, to seek additional height in the order of what is now proposed under the current DA.

Accordingly, it is upheld that the extent of proposed additional building results in an overdevelopment of the site and in any case should form the subject of a Planning Proposal, not a DA.

### **4. UNACCEPTABLE TRAFFIC IMPACT**

The DA is accompanied by a Traffic Report, however it is considered that unacceptable impacts may result from the shortfall of car parking, loading arrangements and roundabout access/intersection, as summarized below:

- The proposed car parking provision represents a shortfall compared to the DCP and RMS Guide rates. It is anticipated that cars may therefore 'overflow' onto the street and into the adjoining car park for Glenrose Village Shopping Centre.
- Further, the Traffic Report has not contemplated the additional car-focused travel patterns that are anticipated in conjunction with the shifting role of Belrose to service a wider catchment, as prompted by the significant quota of commercial floor space (refer Section 1 of this Submission above).
- The queuing of delivery vehicles waiting to enter the site via the 'green' signal, may cause congestion on Glenrose Place and conflict with the loading operations of the neighbouring Glenrose Village Shopping Centre which also utilizes Glenrose Place for deliveries.
- Access to the DA site for all residents, visitors, employees and deliveries, is proposed via a new roundabout in the Glenrose Place cul-de-sac head. Despite the centrality of access to the proposal, the roundabout has not been subject to detailed design and has not been approved by Council's Local Traffic Committee. The proposed new roundabout is considered to constitute an intersection, yet no modelling has been carried out.

It is requested that the DA does not proceed until such time as the above matters have been responded to and publicly-exhibited.

## **5. SUMMARY AND CONCLUSION**

This Submission has demonstrated that DA2020/0393 is unacceptable in its current form. The following objections are summarized:

- The economic impacts of the proposal have not been adequately considered. It is anticipated that the quota of retail floor space may compromise the viability of existing centres and undermine the local retail hierarchy. It is requested that an Economic Impact Assessment is prepared, and exhibited for review and comment, prior to the completion of the assessment for DA2020/0393.
- The extent of retail frontages, and internalization and undergrounding of retail space, would detract from the vibrancy and vitality of the established centre and public domain. It is considered that the extent of retail frontages should be reduced and that all underground commercial floor space should be removed, to avoid unacceptably impacting the established centre and public domain.
- The height and density of the proposal are excessive and represent an overdevelopment of the site. In any case, the proposed height breach should form the subject of a Planning Proposal, not a DA.
- Together, the significant influx of commercial floor space and unprecedented density of development in this location would threaten the local character.
- The proposal may result in unacceptable traffic impacts associated with overflow car parking, conflicting loading operations, and an access proposal that has not been adequately detailed or modelled. It is requested that the DA does not proceed until such time as these matters have been responded to and publicly-exhibited.

Accordingly, it is requested that significant amendments and further information are procured and exhibited for public comment, prior to the determination of DA2020/0393.

