



IRF18/6073

Mr Ray Brownlee
Chief Executive Officer
Northern Beaches Council
PO Box 82
MANLY NSW 1655

Attention: Mr Neil Cocks

Dear Mr Brownlee



Planning proposal for 28 Lockwood Avenue, Belrose (former Belrose Library)

I refer to Council's planning proposal to amend the Warringah Local Environmental Plan (LEP) 2011 as it relates to land at 28 Lockwood Avenue, Belrose (Lot 1 DP 1199795) seeking to introduce 'residential flat buildings' and 'multi-dwelling housing' as additional permitted uses on land fronting Lockwood Avenue and a clause requiring the provision of a minimum floor space ratio of 0.5:1 (with respect to the total site area) for commercial premises before development consent can be granted for a 'residential flat building'.

I appreciate Council's vision to revitalise the site and create for a mixed-use development that provides additional housing and new commercial opportunities in Belrose.

I understand that the planning proposal is an amended version of a proposal lodged by Willana Urban on behalf of Property Platinum Advisors Pty Ltd. At Council's meeting of 19 December 2017, Council resolved to support an amended planning proposal to enable the site's redevelopment. These amendments included not agreeing to any increase in the maximum building height standard as sought by the proponent, requiring that residential development be permitted only to the land fronting Lockwood Avenue and that there be a minimum floor space ratio for commercial development on the site.

I am advised that the Department of Planning and Environment has had ongoing communications with Council representatives and the proponent to clarify what the planning proposal seeks to achieve.

Following the discussions, the Department has formed a view that Council's request for a Gateway determination for the planning proposal as submitted cannot be supported. The Department therefore asks that Council withdraw the proposal and submit a revised proposal.

The Department notes that the planning proposal does not demonstrate how the proposed amendments to the Warringah LEP 2011 will result in improved planning outcomes for the site, or the community, beyond that which could be achieved under the current LEP controls for the site.

In particular the Department is concerned that the following matters have not been adequately explained or justified:

- the retention of the B2 Local Centre zone when the site is predominantly envisaged for residential uses;
- the introduction of a minimum floor space requirement of 0.5:1 for commercial premises, when this is not required of other B2 Local Centre-zoned sites in the remaining parts of the village centre and there is no economic evidence of this requirement being necessary;
- that there be no increase in the maximum permitted building height standard of 8.5m, yet the indication from Council is that development on the site is expected to achieve additional density and scale of three storeys in height; and
- the exclusion of all permitted land uses and permitting only residential development on the land fronting Lockwood Avenue, and yet retaining the B2 zone for this part of the site.


The planning proposal does not explain any consistency, or inconsistency, with relevant state environmental planning policies (SEPPs), particularly SEPP No 65 – Design Quality of Residential Apartment Development. The planning proposal also incorrectly refers to consistencies of the proposal with the relevant section 9.1 Directions.

Additionally, the planning proposal is not supported by key technical information including a traffic study to demonstrate the impact on the road network as a result of the eventual uplift.

I encourage Council to liaise with the Department prior to submitting a revised planning proposal and to work with the proponent to address the above matters. The Department is willing to work with Council on potential options to align with Council's visions for the site.

Should you have any questions in relation to this matter, please contact Ms Yolande Miller, Senior Planner, Sydney Region East, at the Department on 9274 6500.

Yours sincerely



Marcus Ray
Deputy Secretary
Planning Services

11/12/2018