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Ph: [Redacted]
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[Redacted]
Warringah Council,
Civic Centre,
725 Pittwater Road,
DEE WHY NSW 2099

14 March 2006

Dear [Redacted]

Submission Regarding DA 2006/79/0

The first question to be asked concerns whose purposes this development really serves? The application itself indicates that Council staff believes the retail floor area will increase by 170 per cent.¹ With that, and the necessary increase in parking space, how long will it be before parking levies, fees or other charges are introduced? If the experience of the Warringah Mall redevelopment of just a few years ago is anything to go by, someone from Stockland will employ the euphemisms of “cost recovery” and “user pays” sometime soon.

If Council approves the development in the current (or any future) form, it should make the prohibition of any parking fees a condition of approval.

Furthermore, Council needs to ask whether the proposed development really does represent an improvement the community needs. As just mentioned, the peninsula already has a mega-shopping complex in the form of Warringah Mall. Is there much to be gained from creating another one? Again, Council staff have noted in the DA documentation that:

“...The vehicular access to the shopping centre from Ashworth Avenue or connection to Glenrose Place to Ashworth Avenue is not supported due to negative impact on traffic and amenity of Ashworth Avenue and adjoining street...”²

I would suggest that it doesn't take much traffic to 'lock up' the streets around Glenrose now, given that they are all minor suburban roads. While noting that the Coulston Budd Hunt and Kafes Transport Report³ concluded that “the road network, with the proposed works, will be able to cater for the traffic generated by the proposed development”⁴, three other elements should also be considered:

- i) It was not until I began considering the full range of documentation relevant to a DA, that one realised how many of the reports and studies, whether they relate to concrete, groundwater, soil, traffic and the like, have

¹ <http://www.warringah.nsw.gov.au/doccache/1913683.pdf> (p.20, using Adobe numbering)

² Ibid

³ See generally, <http://www.warringah.nsw.gov.au/doccache/1913984.pdf>

⁴ Ibid., p.21 (Adobe numbering)

provided by the applicant. This does raise the spectre, even if only in a general policy sense, of how truly independent any consultant can be. In a practical sense, this should cause Council to consider how much weight it should place on the findings of any reports accompanying DA's.

This comment is not meant as a reflection on this particular DA; I'd make the same comment elsewhere given the same opportunity. Stocklands is required to operate within the same flawed DA process like any other interested parties. It would be worth considering a reformed process, where all developers contributed to a centrally managed fund, whose independent trustees were responsible for commissioning all required reports relating to a DA. The developer would not know, and have no involvement with the selection of a consultant or the report prepared by a consultant; nor would a developer see any of the reports before they went to Council. This would guarantee the independence, both in form and substance, of all consultants hired.

- ii) The traffic report also lists the extensive range of road-works that would need to be undertaken in order to appropriately manage the increased number of vehicles.⁵ Again, as suggested earlier, parking levies would seem to be an obvious means by which Stockland would recover the cost of this economic "externality". Stockland might also raise the rents of shopping centre tenants, which would invariably translate into price hikes for customers.

This danger is only underlined when you consider Stockland's own economic analysis.⁶ While Stockland suggests that the expansion will mean greater revenue for Council⁷ and the creation of 631 new jobs⁸ (where will these people park their cars, and will they be charged for the privilege?), it also predicts about 10 per cent economic declines for other retailers in the trading area.⁹ Even so, Stockland insists that taking that decline into account a redeveloped Glenrose will generate a net employment increase of 568 jobs.¹⁰

The reliability of this projection has to be weighed against project population growth for the area of only 0.7 per cent growth between 1996 and 2001, with similarly small growth to 2016.¹¹ The economic impact statement also concedes that Warringah Mall will remain the major regional retail centre, redevelopments at Balgowlah and here at Glenrose only accounting for a 5 per cent decline at most.¹²

⁵ See *ibid*

⁶ See <http://www.warringah.nsw.gov.au/doccache/1914073.pdf>

⁷ See *ibid.*, p. 48 (Adobe numbering)

⁸ See *ibid.*, p. 39 (Adobe numbering)

⁹ See *ibid.*, p. 45 (Adobe numbering) Refer to Table 4.7 – Colum: "Impact 2008"– Row: "Total TA Centres" to find the percentage change of -10.5%.

¹⁰ See *ibid.*, p. 40 (Adobe numbering)

¹¹ See *ibid.*, p. 17 (Adobe numbering)

¹² See *ibid.*, p.46 (Adobe numbering)

This all makes the current Glenrose redevelopment look like a very ill-advised and economically marginal proposal indeed. Such a view is only underlined when you read the sweeping caveat in Stockland's own report. Namely:

*"...the precise size of the sales impact on any one centre or specific trader that may result due to the redevelopment of Stockland Glenrose is difficult to quantify given that the impact can vary depending on a number of key factors. Some of these key factors which are at the control of the existing retailer include the competitive response that the centre or trader makes to increase competition, how well the existing retailers serve their customer base and the loyalty of those customers to the retailer to name a few factors...."*¹³

This causes me to return to the view that this development is economically marginal, and that parking fees and other surcharges would have to be introduced to make up the difference.

Again, would Council agree, in light of the Warringah Mall experience, to placing a prohibition on parking or any like levies, as a condition precedent to approval?

- iii) The findings of Stockland's own stakeholder engagement process¹⁴ have to be taken with an extremely high degree of caution. Firstly, while the larger a consultative process may be the more expensive it will be, a stakeholder reference group of 13¹⁵ may be considered small, given the overall trading area identified by the economic impact statement.¹⁶

Secondly, the document refers to 505 customers being surveyed at Glenrose.¹⁷ While the Appendices do include the Reference Group's Response to a "Brief" a specimen copy of the survey which over 500 people responded to, is notable for its absence. As a result, you cannot assess what questions were asked, in what order, with what terminology, and whether this affected any of the results elicited.

Thirdly, while Stockland's indicated that it conducted community meetings, generating these results:

"...Issue	# votes
1. No residential development (i.e.: shop top housing)	16
2. Traffic congestion, noise	10
3. Need parking, more accessibility	9
4. No over development like Warringah Mall	9
5. Needs more community cooperation	9

¹³ Ibid, p. 44 (Adobe numbering)

¹⁴ See generally <http://www.warringah.nsw.gov.au/doccache/1913735.pdf>

¹⁵ See *ibid.*, p. 2 (Adobe numbering)

¹⁶ See <http://www.warringah.nsw.gov.au/doccache/1914073.pdf> (Map 3.1 Stockland Glenrose Trade Area and Competitive Context), p. 31 (Adobe numbering)

¹⁷ For example, see <http://www.warringah.nsw.gov.au/doccache/1913735.pdf> p.27 (Adobe numbering)

6. Security – youth, lighting, safety	8...’’ ¹⁸
<u>TOTAL</u>	<u>61</u>

And:

“...Opportunity	# votes
1. Improve precinct aesthetics	21
2. Better community Support, working together	15
3. Greater range of retail & services	11
4. Integrated Glen St. precinct	11
5. Onsite Childcare Facilities	6
6. Improved marketing activity	3...’’ ¹⁹
<u>TOTAL</u>	<u>67</u>

By my tally, there are six stray votes, which apparent from any other factor, brings the credibility and reliability of the consultation process into question.

Summary

I believe that the proposed redevelopment of Glenrose Shopping Centre should be rejected by Warringah Council because:

1. Council staff identified significant vehicular access problems with the DA;
2. Stockland’s own economic analysis, far from presenting an economically viable proposition, is a heavily qualified document. It can be equally read so that one can conclude the proposition is uneconomic;
3. I fear that, unless the most favourable projections are realised, Stockland will resort to parking fees, levies and other charges on customers, to recoup funds;
4. As outlined above, I found Stockland’s stakeholder consultation processes flawed, unconvincing and failing basic arithmetic tests. I suggest Council give it little or no weight.
5. **RECOMMENDATION:** I call on Council to make prohibition of parking fees (and any other like levies) a condition precedent of any Approval. If Stockland refuses this condition, Approval should be refused.

Yours faithfully,

Adam Johnston

¹⁸ Ibid., p. 13 (Adobe numbering)

¹⁹ Ibid