



Ingleside Place Strategy Consultation Outcomes Report

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Contact:

Jacinta Spies
Jacinta.spies@wsp.com.au
02 9272 5577

SYDNEY02 9272 5100

Level 27, 680 George Street, World Square NSW 2000

www.elton.com.au
consulting@elton.com.au
Sydney | Brisbane | Canberra | Darwin | Melbourne | Perth
ABN 56 003 853 101

Elton Consulting is now part of the WSP Group.

Prepared by	Jacinta Spies and Veronica McKerrow
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Reviewed by	Petra Fowler
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2 Introduction

2.1 About the Draft Ingleside Place Strategy

Ingleside sits within a bushland landscape surrounded by Bayview and Elanora Heights, as well as Ku-ring-gai Chase and Garigal national parks and Terrey Hills and Duffys Forest, offering an elevated setting with sea views. Discussion about urban growth in Ingleside has, since the mid-1960s been met with concerns about potential impacts on the variable topography, riparian corridors and watercourse, biodiversity conservation, bushfire risks and servicing constraints.

Prior to the development of the draft Ingleside Place Strategy, a draft Ingleside Land use and Infrastructure Implementation Plan (LUIP) was released in 2016, envisaging 3,400 new dwellings. This LUIP was exhibited for community and stakeholder review and feedback.

Following stakeholder feedback and further work, the draft Ingleside Place Strategy was produced. The draft strategy reduced the developable area, and focused development south of Mona Vale Road where effective evacuation is possible. Development was considerably reduced from 3,400 homes under the LUIP to approximately 980 homes. The area to the north of Mona Vale Road has been identified as an area to retain its existing rural-residential character following detailed consideration of a range of bushfire and evacuation, environmental, and servicing constraints and make intensification of development unsuitable.

The draft strategy carefully considered existing local character and community aspirations. The plan aimed to enhance the features and character that people love, while creating new homes, new opportunities for social connections and services, and new supporting infrastructure. A mix of housing types was proposed, including houses on larger lots, houses on semi suburban lots, and townhouses/low-rise apartments. Playing fields, a community centre and neighbourhood shops are clustered in the centre of Ingleside to provide a tangible heart and focus for community activity.

The draft strategy drew from the Greater Sydney Region Plan A Metropolis of Three Cities, the North District Plan and Council's Local Strategic Planning Statement, Towards 2040. It was the outcome of a process led by the Department of Planning and Environment (the Department) in collaboration with Northern Beaches Council (Council), which has been guided by State agency inputs, and with feedback from the community and stakeholders.

2.2 Purpose of this report

This Consultation Outcomes Report has been prepared to provide an overview of the key consultation activities and feedback received from the community and interested stakeholders during the exhibition of the draft strategy.

This report provides a summary of:

- » how the community and stakeholders were engaged
- » the number of submissions received, who made comment and how
- » what was heard from the community
- » feedback from government agencies and community groups.

The key issues raised by the community and stakeholders during public exhibition and summarised in this report will inform and shape the finalisation of the Ingleside Place Strategy.

3 Exhibition details

3.1 Exhibition period, notification and engagement activities

The Ingleside draft Place Strategy was made publicly available for comment on the NSW Government Planning Portal from 25 May to 23 July 2021. The following communications activities were undertaken:

- » Draft Ingleside Place Strategy placed on the Planning Portal
- » Web content updated on the DPE website
- » Media release
- » EDMs sent at start of exhibition to Ingleside webpage subscribers, plus reminder EDM and exhibition extension EDM
- » Distribution of postcards to residents in precinct and surrounding area
- » Advertisements in the Northern Beaches Review newspaper
- » Social media advertising on Facebook and posts on Twitter and LinkedIn.

The following lists the engagement activities undertaken during the exhibition period:

- » Two face-to-face community information sessions
- » A webinar held through Adobe Connect
- » Social Pinpoint map
- » One-on-one phone briefings with members of the planning team were offered via Eventbrite bookings.
- » A briefing to Northern Beaches Council Councillors
- » A briefing to the Ingleside Community Reference Group, which has been meeting at key milestones in the project since 2017.

3.1.1 Project webpage

The precinct webpage was the key point for more information including viewing the strategy, FAQs and technical reports. The webpage also provided the opportunity to have your say with links to make a submission, to the project engagement hub (Social Pinpoint) with capacity for comments and suggestions, as well as details of how to contact the planner for one-to-one phone briefings.

- » A project webpage for the draft strategy were available during the exhibition period between 25 May to 23 July on the NSW Department of Planning and Environment website at <https://www.planning.nsw.gov.au/Plans-for-your-area/Priority-Growth-Areas-and-Precincts/Ingleside>. The page recorded 14,067-page views by 11,201 unique users, spending an average 5:09 min on the page.
- » The Social Pinpoint map was visited 5,292 times by 2,104 users who left 120 comments.

3.1.2 Electronic Direct Mail

Four Electronic Direct Mailouts (EDMs) were sent during the campaign:

- » First ('Have your Say') sent 25 May to 1,059 recipients.
- » EDM announcing a second drop-in session sent 9 June to 1,046 recipients.

- » Exhibition extension EDM sent 24 June to 1,043 recipients.
- » Final reminder email sent 16 July to 1,043 submitters.

3.1.3 Community postcards

In the first week of exhibition, 3,600 postcards were distributed to residents of the precinct and nearby suburbs including Elanora Heights.

3.1.4 Advertising

To support awareness of the public exhibition and provide the opportunity to share feedback, a range of communications tools were used.

- » Five ads were run on Facebook from 1 June to 30 July 2021, reaching 74,133 users and generating 4,228 click-throughs.
- » Advertisements were run in the Northern Beaches Review on 2 June and 9 June 2021.

3.1.5 Community information sessions

Several information sessions were held during the consultation period including:

- » Two community information 'Meet the Planners' session days were held. On 9 June, 150 people participated across four sessions and on 21 June, 70 people attended the three sessions at the Monash Country Club.
- » The Ingleside Community Reference Group, who have been engaged at key milestones in the project since 2017, were briefed on 10 June.
- » An online information session was held on 15 June for the community to be briefed and ask questions, with 60 attendees.

3.1.6 One-on-one sessions

One-on-one sessions were held between July 12 and July 21 with a number of community members booking in for a phone briefing. These sessions were added late in the exhibition in response to the high level of interest. There was a total of 16 sessions where participants were given the opportunity to raise any questions and concerns. Further information related to the themes was provided to participants and is also included below.

- » **Sustainability:** DPE can continue working with the council to ensure all guidelines have been followed. Bio-detention is being utilised to capture water above the creek and filter it, protecting the flow into creeks and lagoons. Some significant pockets of land are being zoned as E2 to protect the environment and have no development on it. Council is working on a Development Control Plan which specifies detailed controls such as minimum landscaped area etc and will be exhibited later in the year.
- » **Bushfire evacuation:** the Department worked with NSW Police, NSW Fire and Rescue, NSW Rural Fire Service (RFS) and Council to review the bushfire risks. In particular, NSW Fire and Rescue was involved in the modelling of ignition points and scenarios and a dedicated RFS officer worked through the bushfire technical report to ensure it was technically accurate and the organisation has confirmed that it has no objections to the draft strategy being exhibited.
- » **Schools:** Department of Education has advised that upgrades to existing schools could carry additional demand, noting the significant reduction of number of dwellings to what was proposed in the 2016 draft Land use and Infrastructure Implementation Plan.
- » **Infrastructure:** Developer contributions would be utilised to add kerb and guttering to roads and make them a standard 20m wide. The Department will work with Transport for NSW to look at upgrades to Pittwater Road and more regular bus services.

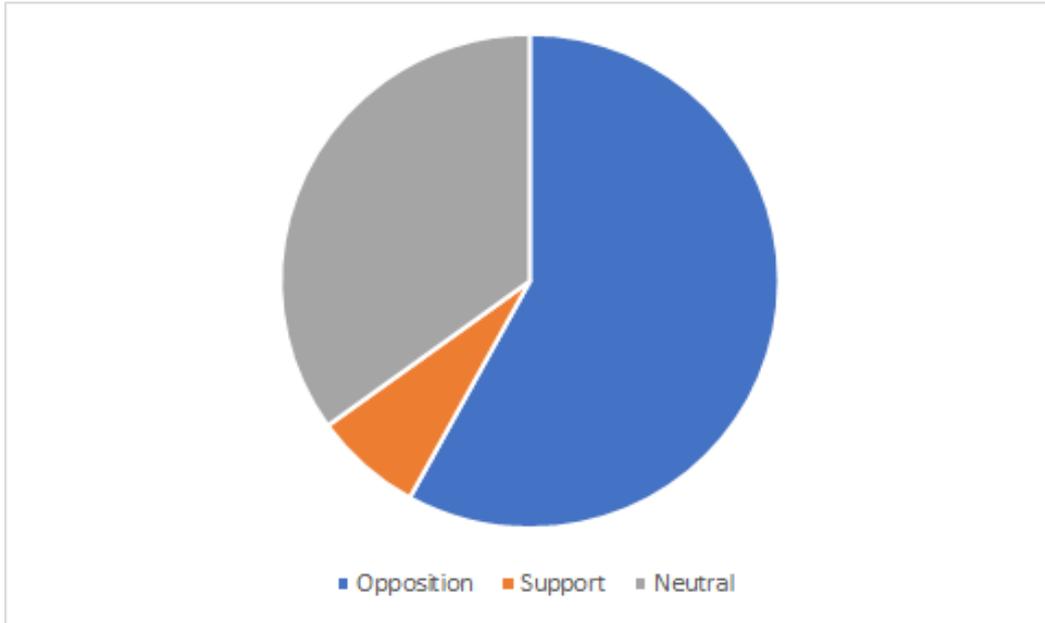
- » **Aboriginal cultural heritage:** Technical studies undertaken to support the strategy identify no change to Aboriginal heritage under the current plan. At the request of Traditional owners, the Department has not identified culturally significant sites.
- » **Traffic and transport:** A solution to the increased traffic along Powderworks Road from new developments needs to be worked through with council before any plan is finalised. Traffic studies are ongoing, and consultants are reviewing constructive ideas provided by the community feedback along with better pedestrian access along roads.

4.4 General level of support

More than half of the submissions were in opposition to the draft strategy.

The following statistics were gathered based on clear language indicating support or opposition. Submissions where there were mixed views or no clearly expressed support/objection have been labelled neutral. In all, 58% were classified as negative, 35% neutral and 7% supportive of the draft strategy.

Figure 3: received level of support



Nearly 2/3rds of submissions (62%) included requests for further infrastructure to be in place before any additional housing is built in the area, expressed in comments such as:

In support:

"As long as you keep investing in the infrastructure needed to support the development (transport and schooling) I look forward to seeing it happen."

In opposition:

"I strongly oppose this development until there is appropriate infrastructure to support it."

Neutral:

"Further planning needs to be undertaken for the development especially if the housing and expected numbers are to remain!"

5 Submissions by the community

A total of 897 submissions was received from community members, predominantly residents from Ingleside or neighbouring suburbs. This included 660 submissions received via email or the online webform and 237 comments on Social Pinpoint.

Most community submissions expressed concerns about:

- » infrastructure, namely local roads
- » environmental sustainability
- » bushfire management and evacuation routes
- » density and local character

Figure 4 summarises the key issues raised in the submission by the community. A discussion of these themes and the Department's response is outlined in Sections 5.1 to 5.4.

Figure 4: Summary of key issues raised by the community

Issues raised in submission by the community	Proportion of submission %
Bushfire management and evacuation routes	27%
Environmental sustainability	37%
Desire to preserve semi-rural character	14%
Density:	
Opposition towards increase density	14%
Support towards increased density	4%
Infrastructure:	
All infrastructure	62%
Roads	52%
Schools	18%
Open space and recreation	5%
Utilities	4%
Public transport	8%

5.1 Bushfire management

Planning for Ingleside focuses on reducing or mitigating risk and vulnerability to natural hazards by:

- » Quarantining areas of greatest risk from increased density
- » Building evacuation capacity into the design of the area

Some 27% of submissions raised bushfire and evacuation concerns, especially regarding traffic management during an emergency.

Increased density in areas of less risk

Most submissions that addressed bushfire risk were concerned that an increase in density would affect the entire precinct by creating additional strain on all roads through increased traffic movements.

While the Department developed the draft strategy in consultation with the NSW RFS and incorporating community responses to the 2018 Bushfire Risk Assessment, some community members expressed concerns that the proposed changes do not solve the bushfire risk.

Evacuation capacity

Some 27% of submissions expressed objection to the draft strategy due to their concerns about bushfire evacuation management. Concerns are summarised below:

- » potential bottlenecks on Powderworks Road due to an increased number of residents attempting to evacuate the area
- » larger number of new residents needing to leave via Wilga Street onto Powderworks Road could create a bottleneck
- » reliance on remote assistance for evacuation such as SMS, radio and internet, to alert people in a timely manner and allow an orderly evacuation
- » desire for a specific evacuation plan for residents on Wilga, Caladania and Dendrobium streets.
- » emphasis that Mona Vale Road is not a suitable fire exit
- » concerns that modelling for the strategy underplays the real-life risk of a catastrophic bushfire scenario in Garigal National Park.

5.2 Environmental sustainability

Planning for Ingleside seeks to protect the environment and preserve the natural and biophysical assets. Of the 37% of submissions that referred to environmental sustainability, most submissions simply noted their objection to the draft strategy due to "environmental impacts". Of those that provided more detail, concerns included:

- » the need for specific protection of endangered flora, fauna and wildlife corridors, including the endangered ecological community Duffy-s Forest
- » protection of the riparian zones, including the endangered ecological community Coastal Upland Swamp
- » protecting water quality and water cycle management
- » need for greater focus on net zero carbon emissions.

Rezoning of wildlife corridors

Of the 37% of submissions that referenced environmental sustainability, 15% raised concerns about the potential impacts of rezoning on wildlife corridors, particularly the wildlife corridor connecting Garigal National Park to Ingleside Chase Reserve.

Two Endangered Ecological Communities (EEC) were mentioned: the Duffys Forest community and the Coastal Upland Swamp. It was noted that the Duffys Forest community only occurs in Ingleside, Terrey Hills, Duffys Forest and Belrose and nowhere else in the world. Submissions that mentioned this unique community emphasised the importance of protecting its endangered wildlife and species, such as *Grevillea Calevi* which are considered under threat from increased urbanisation.

There were additional concerns many wildlife corridors would be under threat and cease to exist as cats, noisy miners, red foxes and exotic plants increase in the area. It was noted that with diminished wildlife corridors from increased density, proposed environmental protections may be insufficient in protecting local ecology.

Inadequate protection of riparian zones

Another common theme was the protection and management of riparian zones. Many respondents felt these zones should be widened, with several suggestions of an increase of at least 100 metres.

For example, several submissions suggested there needs to be at least 60 metres of clearance between the Coastal Upland Swamp and the beginning of residential land to allow for suitable distribution and movement of water.

"We understand and accept that the land including the creek should have a reasonable set-back as a buffer area is required. Our concern along with others impacted by this is that the land acquired is fair and reasonable in the circumstances and that all landowners who are affected by this should be compensated on a fair and equitable basis based on the market value of such land."

There was also strong preference for public ownership of the riparian corridors by almost 30 submissions to better ensure appropriate environmental conservation. Some respondents commented that potential runoff from construction, fertilisers and sediment on concrete surfaces presented an increased risk of polluting Narrabeen Lagoon catchment, and that public ownership of creek corridors would mitigate this risk.

"The proposal places riparian zones in private ownership. This means that society cannot ensure that these essential environments that feed into Narrabeen Lagoon can be protected. This may lead to siltation in Narrabeen Lagoon, toxic runoff (e.g. weedkillers, heavy metals, detergents etc), weeds and unwanted organisms displacing native animals and plants."

Currently endangered fauna

While most submissions simply stated there is little protection for endangered fauna, almost 20 submissions noted the risk to specified threatened animals, including:

- » Pygmy Possums
- » Regent Honeyeaters
- » Black-faced Swamp Wallabies
- » Long Nosed Bandicoots and Southern Brown Bandicoot
- » Lyrebirds
- » Glossy Black Cockatoos
- » Spotted-tailed Quoll
- » Giant Dragonfly

"Being surrounded by land earmarked to become part of Ingleside Chase Reserve which we fully support, we have noticed already, since widening of Mona Vale Road commenced, a reduction in wildlife numbers especially Black-faced Swamp Wallabies and Long Nosed Bandicoots. Pre-dating the road widening, a reduction in small bird and Lyrebird numbers has been observed."

Water quality and water cycle management

There was particular concern about Narrabeen Lagoon and the streams which feed into it, noting it is a fragile ecosystem with limited resilience to water-borne pollutants, with respondents noting careful management of water run-off from the Ingleside Release Area will be required to minimise potential harmful impacts on the lagoon, such as potential increase of flooding due to increased percentages of hard surfaces leading to more runoff during rain events.

It was noted that current issues with storm water management could worsen with increased density. Questions were raised about storm water management and potential impacts on the wetlands and surrounding properties. Residents from neighbouring suburbs were particularly concerned about flood management with additional stormwater volumes due to more run-off from hard surfaces from South Ingleside. It was noted that the water course is already an issue due to the aging storm water infrastructure and additional infrastructure will increase the water runoff from the area. Further details are covered in section 5.4.4.

We already suffer greatly due to aging storm water infrastructure which was not designed for the current level of development and climate change. My concerns specifically relate to the 'medium' density development in area 3 which is proposed to contain 410 of the approx. 1000 residences proposed, including unit blocks. This will drastically increase the water runoff from the area draining into the region of Wesley and Foxall streets.

Net zero carbon emissions

In addition to the current environmental situation, five submissions also request greater focus on net zero carbon emissions and mitigating climate change. It was noted that it is not apparent how these aspirations will be met and there is potential for Ingleside to 'show by example' how it is making progress on net zero carbon emissions.

- » Suggestions on emission reduction included: electricity produced by renewable energy (solar panel installations on suitable roofs)
- » community batteries
- » alternative on site wastewater treatment
- » encouraging electric vehicle take-up with more charging points
- » improving public transport and decreasing reliance on cars
- » connected pedestrian walkways and cycling paths.

"As with the first Strategy Plan, there are general statements throughout the documents which are 'mother statements' with no commitments on how mitigation of Climate Change will be achieved."

5.3 Increased density and Ingleside's semi-rural character

The vision outlined in the draft strategy is of a well-connected, great place to live noting:

- » development should maintain Ingleside's semi-rural and bushland character and build on these special qualities
- » appropriately placed and scaled developments intermingle with open space and local street connections

- » the community heart is walkable and features large tracts of natural and active open space alongside community facilities, childcare facilities, shops and services.

17% emphasised the importance of maintaining the semi-rural and bushland character, with respondents concerned about the feasibility of maintaining the current character following the introduction of 980 new dwellings. Several respondents requested reallocation of lot sizes and rezoning across the different character areas.

Ingleside's semi-rural and bushland character

There is a desire to maintain the semi-rural and bushland character, with 17% of submissions making direct reference to Ingleside's current character.

- » Community members questioned the raised concerns about maintaining the area's ecosystem and local character, which was described as: natural beauty, surrounded by bush and open space
- » mini farmland
- » leafy and spacious
- » quiet and peaceful
- » semi-rural, yet close to the beach.

"This unique area provides a small corridor of countryside between city suburbia and the Northern Beaches that will be decimated by such a development. The only winners will be the developers. How can 980 dwellings in such a small area 'maintain the semi-rural' feel of the area. I have a back yard; I do not classify that as semi-rural."

"I strongly oppose the Ingleside development. We are fortunate enough to be surrounded by bush / open space & a diverse range of housing. Acreage / residential homes & higher density housing - such as Warriewood valley. This is what makes this part of the northern beaches magical."

Appropriately placed and scaled development

14% of submissions provided a clear indication of opposition towards increased density. Within this group, several respondents provided suggestions on the reallocation of lot sizes and rezoning across the different character areas, while others opposed medium-density development per se as unviable and out of character for Ingleside.

In contrast, the 4% of submissions that clearly expressed support for the draft strategy noted that higher density will provide access to more affordable housing.

"We would like our property to be rezoned, to enable much needed affordable housing in the Northern Beaches area of Sydney. We are all aware there is a land and housing shortage in the Greater Sydney region. Ingleside is well overdue for development and offers an abundance of virgin land ready to welcome new residents and young families to make a home and enjoy the great lifestyle that the Northern Beaches has to offer."

"I grew up in Elanora and it's frustrating that I can't afford to buy a home in the area I've lived in most of my life even though I'm earning a good salary. It makes sense to provide a range of dwelling options for singles and child-free couples who don't need (or can't afford) a large family home."

"I'm sure affordable housing has been brought up as a reason to develop, but even as someone who cannot afford to buy a home, I do not want this development because this will change the area into somewhere I don't want to be!"

In addition to higher density changing the character of Ingleside, concerns were raised by 11% respondents that Wilga Street is an inappropriate location for medium density housing, as: it is a remote and isolated pocket of land with one road in and out and is beyond walking distance to the nearest retail centre and proposed town centre

- » potential impacts of increased density on bushfire evacuation methods
- » increased traffic to and from Powderworks Road could result in traffic jams during peak period.

Across submissions there were a mix of suggestions for rezoning and reallocation of higher density areas, including:

- » to expand the area of development and increase the minimum lot size to 1000 square metres suitable for family housing
- » reduce minimum lot sizes on land to the north of Mona Vale Road to 1 acre (from the current 5 acre-minimum) to allow for a modest increase in density
- » re-position a portion of the medium density dwellings closer to Mona Vale Road which, respondents asserted, is both a better emergency escape route and is closer to transport routes, community centres, shopping areas, parks and schools.
- » retain larger lot sizes along the western side of Ingleside Road should be larger (1,500 sq. m) to retain the character of the existing houses on the road. and
- » a more gradual increase from rural to low density to higher density

Community heart

There was little direct reference to the community heart, with only 4% of submissions referring to the area. Of these, several were in opposition to its location due to:

- » the current location being a dangerous intersection
- » area size being too small to accommodate community needs.

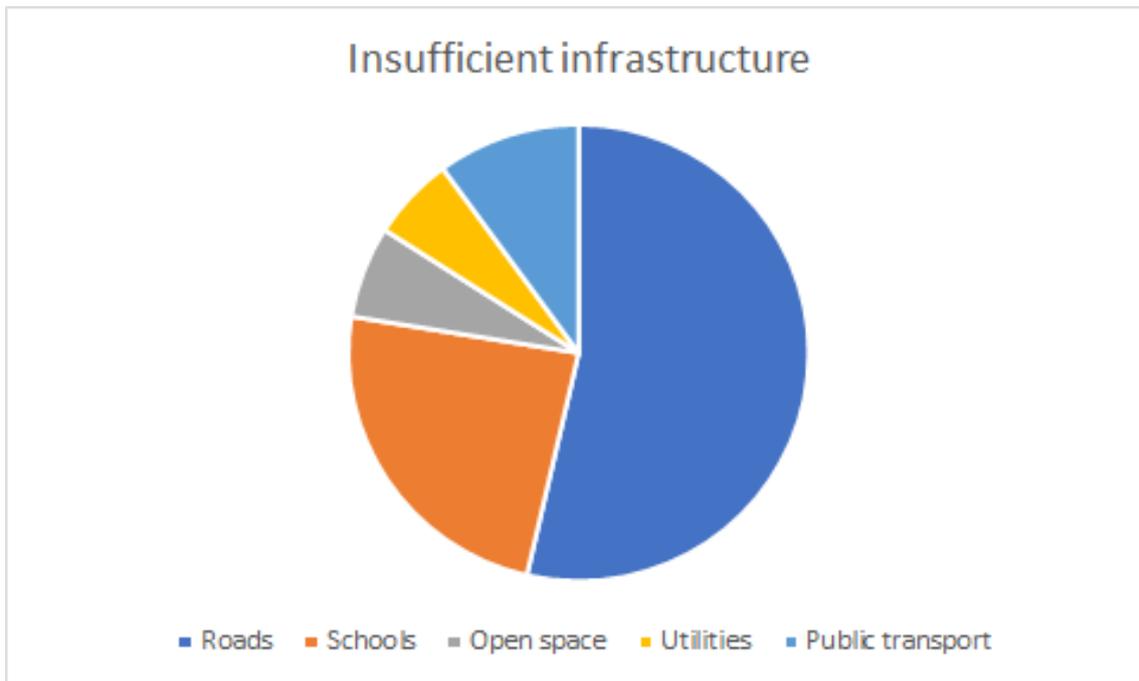
"The proposed current location is an extremely dangerous location. Over the years many vehicles have lost control and veered off into exactly the location of the Neighbourhood centre. It is a terrible intersection. It would make far better sense to have it either close to the open spaces or visible from Mona Vale Rd. This location would serve the residents of North."

5.4 Infrastructure

The draft place strategy recognises the importance of the right infrastructure to maintain or improve the quality of life for residents in and around Ingleside. However, most respondents articulated a clear desire for improvements to be made before further development.

Of submissions responding to this theme, 62% raised concerns that for an additional 980 dwellings there is insufficient infrastructure planned for the area. Of these submissions, five specific concerns were raised, as quantified in the pie graph below.

Figure 5: Reference to infrastructure – roads, schools, open space, utilities and public transport



5.4.1 Road infrastructure

Of the 62% of submissions that referred to the lack of suitable infrastructure, 83% emphasised traffic as a huge problem. It was noted that the roads currently struggle to handle the high volume of traffic and an increase in density without additional road infrastructure would increase travel times. Most of these submissions emphasised the lack of road infrastructure as one of their primary reasons for opposing the draft strategy.

Powderworks Road

Powderworks Road was the most referenced road in Ingleside, with community members rating it 'at full capacity' and expressing concerns that additional cars would increase travel times. Common concerns included:

- » traffic is regularly congested, particularly during morning and afternoon peak hours and on the weekend
- » it is a dangerous road with higher accident and death rates
- » the proposed roundabouts are likely to slow traffic further, leading to congestion and blockages
- » it is difficult to turn onto Mona Vale Road from Powderworks Road in peak traffic time
- » Powderworks Road will become a major thoroughfare and is not designed to act as one
- » driveways on Powderworks Road require reversing in or out
- » inadequate pathways for safe pedestrian use
- » difficulty turning onto Garden Street from Powderworks Road
- » with increased density on Wilga Street and only one road in and out to Powderworks Road, there will be a huge increase in traffic congestion.

The most commonly suggested resolution for these concerns was to widen Powderworks Road particularly from Wilga Street up to Mona Vale Road, noting that this might not be achievable.

"Powderworks Road is a dangerous road, it has a higher-than-normal accident and death rate, it is single lane and along much of its length there is no space for pull over areas for buses. Buses and trucks already block traffic. Powderworks Road is often a full capacity now, additional cars and buses will be constant traffic backup. This will be even more dangerous and congested during bushfires and accidents."

"Traffic exiting Powderworks Road to Mona Vale Road and to Garden Street currently experiences a 5-15 minute delay during peak hour and more on rubbish collection days. Traffic on Powderworks Road is frequently backed up all the way from Mona Vale Road to Wilga Street. Traffic on Powderworks Road has already outgrown the road's capacity, causing delays, inefficiency and a high incidence of accidents. In places, it is steep and narrow, with no provision for (or even possibility of) widening."

5.4.2 Educational facilities

Of the 62% of submissions that referred to the lack of suitable infrastructure, 29% raised a belief that local schools are currently at capacity and greater consideration for a new public school is required. Comments included:

- » Elanora Heights Public School is the catchment school and is at capacity. Mona Vale Public and North Narrabeen Public are overcrowded
- » as there is no new school planned for the South Ingleside Precinct there would be increased traffic on the road driving to Elanora Heights, Mona Vale and Narrabeen
- » at a minimum the Department of Education should explain how they plan to manage capacity at schools in the area.

"Elanora Heights Public School is the catchment school and it is at capacity. Children in the new development will likely be driven to school and will further cause traffic and a dangerous drop off situation. The North Narrabeen education precinct is still years of development and if children do attend those schools again it will add further cars and traffic to Powderworks Road. It is poor planning to open up Ingleside for development without the adequate supporting infrastructure/upgrades to schools."

5.4.3 Open space

Of the 62% of submissions that referred to the lack of suitable infrastructure, 8% referred to various improvements for the use of open community spaces. Many of these comments were in relation to maintaining greenery and natural open space. Additionally, respondents requested improvements including:

- » biking facilities including bike paths and a pump track
- » hiking paths and parking opportunities in existing bushland
- » ensuring enough parking to accommodate any new sporting facilities
- » horse riding facilities, noting the value of the Ingleside Riders Club to the area.

"There also seems to be no allocation in the development of parks, walking paths, or bike riding areas."

5.4.4 Utilities

Of the 62% of submissions that referred to infrastructure improvements, 7% mention utilities. Most comments came from residents living in North Ingleside, requesting access to sewer, town water and drainage.

"I live on Chiltern Road Ingleside. We have NO WATER or clean drinking water (this is a basic human right) NO sewage or Kerb and gutter."

"We are disappointed with the proposal due to the total absence of any plans for INGLESIDE Nth. As rate payers we note our rates are significantly excessive given the lack of services provide to our area."

A small number of the submissions which were not from residents from North Ingleside questioned Sydney Water's agreement to the use of the existing gravity drained sewer infrastructure, as blockages occur due to incorrect items being flushed as well as ageing infrastructure being damaged by tree roots. Additionally, questions were raised about how stormwater will be managed with submissions noting current storm water infrastructure is inadequate and they felt the proposed drainage retention would also be inadequate. It was suggested that stormwater management should be improved before developers begin construction.

"My concerns specifically relate to the 'medium' density development in area 3 which is proposed to contain 410 of the approx. 1000 residences proposed, including unit blocks. This will drastically increase the water run-off from the area draining into the region of Wesley and Foxall streets. This proposal has not stipulated how that water will be managed and whether it, or parts of it, will drain into the already overloaded and aged infrastructure mentioned above."

5.4.5 Public transport

Of the 62% of submissions that referred to infrastructure improvements, 12% referred to the fact there was no proposed increase or improvement to public transport. Respondents described current public transport as 'infrequent and at capacity' and requiring greater consideration.

"There is no public transport in this area. The documents do not appear to have addressed how movements can occur between nearby suburbs and to the nearest major shopping hubs/schools/etc other than to say, 'on demand public transport'. School students and older residents come to totally rely on public transport. What proportion of the 3,000 will be needing public transport? The documents do not address this at all."

"Public transport is an issue. The area will need more frequent bus services plus the bus service to the CBD in peak periods."

5.5 Additional concerns

Several references to the following themes were also noted.

Economical sustainability

More than 30 submissions questioned the economic sustainability of the proposed development seeking a better explanation of how the significant costs of the development will be paid. Respondents highlighted the \$30,000 per dwelling estimate of developer contributions was unrealistic, especially in comparison to Warriewood Valley's \$70,000 per dwelling. A small number of submissions highlighted the shortfall would result in either an increase of rates or the removal of community facilities. Submissions emphasised the requirements for land purchases and significant infrastructure could not be met with the current funds and sought better explanation of how this will be covered.

"The current proposal does not make sense financially when the value and level of public infrastructure required is considered. It is not big enough to generate sufficient developer contribution funds but is too big for existing assets to be expanded and repurposed."

Aboriginal and European Heritage

While it was recognised that the draft strategy acknowledges the retention of Aboriginal heritage and geological sites, almost 30 submissions requested an Aboriginal Heritage Assessment report and explanation of how any sites that contained Aboriginal heritage would be protected with the increase in density.

A submission from an Aboriginal Elder sought support in protecting and preserving Ingleside's Indigenous secret sites, noting "...it is important to us as this land holds rich Aboriginal heritage".

6 Submissions by community groups

6.1 Terrey Hills Progress Association

The Terrey Hills Progress Association's major concern is the threat of bushfire/ember attack. It was noted that this was a major concern in response to the 2016 public exhibition of the proposed land release which resulted in the commissioning of a Bushfire Evacuation Study of Ingleside. The study was released prior to the 2019/2020 bushfire season and the modelling of behaviour in the study needs to be reviewed due to the never seen before behaviour of bushfire and ember attack. The Association also stated that the Department needs to further explain aspects of its modelling. The Association also strongly urges that council stipulate the inclusion in new homes of measures that increase fire resistance, including less flammable building material, rainwater tanks and bushfire-resistant plants.

The Association expressed strong concern over the number of trees which will be destroyed and commented that satisfactory fauna corridors for the local native wildlife do not appear to be included, raising the risk that developers will destroy all the natural environment including the creeks and wildlife habitats.

It was noted that public transport options are currently negligible, and the road system is way below par. Concern was raised about the considerable impact the proposed development will have on all infrastructure and communication systems in Ingleside and surrounding residential suburbs, including Terrey Hills/Duffys Forest.

6.2 Friends of Narrabeen Lagoon Catchment

The Friends of Narrabeen Lagoon Catchment was formed 16 years ago with a mission to protect the remaining bushland in the catchment of Narrabeen Lagoon. The organisation represents over 1,400 members and supporters. The group expressed concerns about the draft Ingleside Place Strategy including that:

- » the wildlife corridor between Ingleside Chase Reserve and the Garigal National Park is proposed to be disrupted and partly covered by housing. The riparian zone planned along this corridor is too narrow to serve as a wildlife corridor even if the land to the west of the Coastal Upland Swamp was retained as bushland.
- » at least 60m clearance is required between the Coastal Upland Swamp area and the beginning of residential land to allow for suitable water movement.
- » the draft Biodiversity Assessment Report completed by Ecological Australia is from 2016 and should be updated to address the Biodiversity Assessment Method (BAM) 2020. Only 50% of the entire study area was properly surveyed due to areas being in private ownership and there has not been sufficient provision made to protect endangered flora and fauna.
- » the NSW Office of Environment and Heritage has prepared plans for the study and protection of the Angus Onion Orchids and the draft strategy needs to acknowledge the importance of this critically endangered plant and ensure plans do not disturb its remaining habitat
- » Duffys Forest Endangered Ecological Community (EEC) includes endangered species such as *Grevillea caleyi* for which a recovery plan has been written. The documented major threats to the survival of *Grevillea caleyi* include loss of habitat and urbanisation.
- » the need to protect the area's important wildlife corridor that has been known to be used by Regent Honeyeaters (*Anthochaera Phrygia*)
- » areas around Manor Road provide documented habitat for pygmy possums (*Cercartetus nanus*) and yet the plans are for a substantial part of this to become housing.
- » waterways that flow through this area and down to Narrabeen Lagoon could be contaminated by residential use.

- » Bushfire evacuation from the proposed area in case of a bushfire emergency would be extremely difficult as there are very few road connections and there are already a large number of people in Warriewood Valley and Elanora Heights that would be trying to use the same roads.

6.3 Pittwater Natural Heritage Association

The Pittwater Natural Heritage Association (PNHA)'s submission noted the organisation has been working to protect biodiversity in the Pittwater area for over 25 years and has been engaged with the Ingleside precinct planning process since its first iteration in 2013. The Association also lobbied for fauna overpasses and underpasses on the upgraded Mona Vale Road.

As an environmental group, the

PNHA expressed opposition to the draft strategy due to concerns over potential loss of biodiversity including a number of threatened species. potential loss of Endangered Ecological Communities such as Coastal Upland Swamp and Duffys forest. When the catchments of Coastal Upland Swamps are subject to residential development, the quality and quantity of urban runoff has a degrading effect due to elevated levels of nutrients and sediment and raised pH due to the buffering effect of concrete. Over time nutrients may increase to a level which starts to damage the Swamp and eventually destroys most of the native vegetation within them. They are also degraded by changes in water movement and weed invasion. PNHA believes that this ecological community must be preserved, not only for its own sake, but to assist preservation of the habitat of the Critically Endangered *Grevillea caleyi* within the wider Ingleside area.

- » Lack of fauna connectivity through the precinct (fauna corridors). The PNHA commented on the lack of a complete, workable fauna corridor: instead, it includes a riparian zone in private ownership along the north arm of Mullet Creek, which appears to connect with the Coastal upland swamp between King and Waratah Street, then terminates without reaching Garigal National Park. The PNHA recommends a clear fauna corridor is created to link the fauna underpass on Mona Vale Road, the bushland around Ingleside Road, the riparian corridor on Mullet Creek and Ingleside Chase Reserve. Additionally, the PNHA recommends that, to reduce roadkill within the precinct, fauna crossings are required on Powderworks Road and other roads which intersect fauna corridors.
- » No protection for riparian zones on Mullet Creek and tributaries. The PNHA recommends riparian zones are 100 metres wide to enable them to properly improve water quality, and to act as efficient wildlife corridors through the precinct. In addition, the PNHA recommends riparian zones must be zoned E2 and held in public ownership.

6.4 Garigal Deep Creek Residents Association

The Garigal Deep Creek Residents Association is a group of 35 owners of five-acre properties in Caladenia Close, Dendrobium Crescent and Mirbelia Parade Elanora Heights representing around 175 residents.

The properties are all in an Open Flame Zone of an Extreme-Risk Bushfire Area and concerns were raised about the EcoLogical Bush Fire Strategy Study (23 March 2021), noting:

- » the study did not include the area in its study
- » the combination of existing residents and additional planned dwellings with the only egress being Wilga Street and then Powderworks Road means that in the event of bushfire, there is an increased risk of loss of life, homes and other property due to vehicle congestion
- » the EcoLogical Bush Fire Strategy Study relies on remote assistance as assisted evacuation cannot be guaranteed, with no consideration of the limitations of the Telstra network, power outages or technology failure

- » the EcoLogical Bush Fire Strategy Study makes assumptions about driver behaviour, firefighter access, water supply, adherence to emergency messages, unpredictable events and does not adequately analyse the ability of Powderworks Road to handle the volume.

The submission raised further concerns including:

- medium density housing should be located near public transport and shopping precincts. Noting the Elanora Heights shopping centre is closer to this area than the proposed retail shops in Ingleside and neither is within walking distance, this submission proposes Wattle Street as a better location for rezoning
- traffic congestion in the area will only worsen with more residents, particularly Powderworks Road the area is home to endangered species of flora and fauna which are seriously threatened by the scale and density of the proposed development. The Narrabeen Lagoon and the streams which feed it are fragile eco-systems with limited resilience to water-borne pollutants.

6.5 National Spiritual Assembly of the Bahá'ís of Australia (the National Assembly)

The National Assembly's submission noted that its Temple site has welcomed hundreds of thousands of visitors since the 1950s. The site houses the only Bahá'í House of Worship in Australia.

The National Assembly declared its interest in working with the Department and Northern Beaches Council to better harmonise the Bahá'í Temple site with the Ingleside community. The submission proposed that:

- » The unique and strategic attributes of the Bahá'í Temple site should be recognised within the draft Ingleside Place Strategy (and future comprehensive Northern Beaches LEP) in order to both accommodate growth and maintain the tranquillity and sanctity of the area surrounding the House of Worship.
- » The Bahá'í Temple site should be zoned as SP2 Place of Public Worship in recognition of its longstanding existing use and to facilitate development in keeping with its special characteristics and minimising any adverse impacts on surrounding lands.
- » The Bahá'í Temple site should be acknowledged as a key site and stakeholder within the wider development of Ingleside. The National Assembly believes Excluding the Bahá'í Temple site from the urban land release area, is a missed opportunity.

6.6 Serbian Orthodox Church

The St Sava Serbian Orthodox Church Parish generally supports the overall intention of the Strategy to create new housing in Ingleside, however, the Parish strongly objects to the location of the proposed new road through the centre of their land, noting it will have a deleterious impact on both the existing and future functionality of our site.

The Explanation of Intended Effect document was referenced, noting page 25 shows the location of the proposed roads. With consideration to the proposed location of new roads, the organisation believes this proposal would impact upon the Council approved Cathedral, Car Park, and School Hall. In the case of the School Hall, it would potentially require it to be demolished impacting the delivery of the many services that the Parish provides to the community. Some services may need to be curtailed or even stopped.

The submission asks that the Wilson Avenue access to the site be improved and include a buffer from the proposed medium density dwellings and the site by creating roads on the eastern and southern boundaries.

It was also noted that the Parish believe the Biodiversity Corridor shown through their land is incorrect

6.7 Wilga Wilson Residents Association

The Wilga Wilson Residents Association (WWRA) represents owners of the land bound by Wilson Avenue and Powderworks Road to the north, Wilga Street and Powderworks Road to the east, Wilga Street to the south and the 'paper road' being the extension of Mirbelia Parade to the west. The WWRA welcomes the latest iteration of the planning proposal and associated supporting documents for the Ingleside Release Area.

The submission recommends:

- » the completion of the draft DCP and Local Contributions Plan under S. 7.11 as soon as possible to allow time to comment
- » Clause 4.6 of the Pittwater Local Environmental Plan 2014 be applicable for proposals within the precinct
- » reducing the sizing of rainwater tanks in the precinct to no greater than BASIX requirements
- » construction of the Mirbelia Parade 'paper road' extension, and adoption of the riparian corridor widths as per the relevant reports with the mapping of the internal road network in this area adjusted to suit the use of these amendments - this will avoid duplication of roads and ensure the more efficient use of land
- » rezoning of the proposed R5 Large Lot Residential land in the south-western portion of the precinct to R2 Low Density Residential, to better correspond with actual bushfire hazard and egress opportunities from this area
- » given that the viability of providing affordable housing within the precinct is questionable, recommend that focus should be directed towards examining whether a potential Affordable Housing Contribution levy could be applied across the precinct, subject to viability testing - any monies collected may be applied to supply affordable housing within the LGA.

6.8 Garigal Landcare

Garigal Landcare's submission notes the group has been involved in restoration and protection of bushland in many locations for nearly 20 years and has learned much about the resilience and capabilities of bushland, the different functions of core bushland and buffer zones, the important contribution of waterways, the specific topographic requirements of certain species and the destructive forces of bushland segmentation, pollution from nutrients and chemicals in runoff water and from light and noise pollution. The submission opposes the Place making strategy for Ingleside due to concerns including:

- potential destruction of bushland and removal of areas that function temporarily as escape areas in fire events (larger open spaces on rural lands)
- potential reduction of habitat for flora and fauna including endangered species/ communities
- potential segmentation of habitat, by provision of only a non-functional wildlife corridor (far too narrow, must be 100m)
- potential sedimentation of waterways
- potential changes of hydrology with increased runoff from hard surfaces and diminishing water supply to uphill swamp and increased runoff into Narrabeen Lagoon, with increased flood risk there
- need for inclusion of sustainable development and climate change predictions
- potential fire hazard
- evidence from council's housing plan indicates housing needs can be accommodated in other locations
- potential for increased traffic on local roads to cause further segmentation of wildlife habitat and increase in roadkill.

6.9 Ingleside Riders Group Inc.

The Ingleside Riders Group (IRG) was formed in 2003 and is run entirely by volunteers. IRG was formed to provide a safe and social environment for all equine riders and instructors in the area to come together and enjoy the facilities and exercise. IRG is located on approximately 9 acres of land between Wattle Street and McLean Street, Ingleside. IRG has a license agreement with the Minister of Education to use this land. This parcel of land has been earmarked as sports/recreational grounds. In its submission, IRG implores that this land, or at least part of it, is saved for its current equine use.

6.10 Bayview & Ingleside Residents Association Inc

The Bayview & Ingleside Residents Association's position is that North Ingleside should be developed as a larger block rural style living to reduce bushfire hazards. The Association comments that its position is supported by the bushfire report commissioned by the Northern Beaches Council, which states the mitigation of bushfire risk as it relates to evacuation can be relatively easily resolved with asset protection zones or development adjacent to bushland areas along the key evacuation pathways, which should also enhance the ability of the northern side to be evacuated or provide availability for development. The Association suggest it is imperative the Blackash Bushfire Report be taken into account during the evaluation process.

6.11 Southern NSW Branch of BirdLife Australia

In its submission, the group noted that BirdLife Australia is Australia's largest bird research, bird watching and conservation organisation, mounting projects such as the Woodland Birds for Biodiversity project, partly funded under the NSW Office of Environment and Heritage's Saving our Species program. The group comments that local bird species, the Regent Honeyeater and Swift Parrot are Critically Endangered under the EPBC Act and that action should be taken or approved which is likely to threaten or cause any further decline of these species.

The submission raised that it is important that all remnant vegetation that provides important wildlife habitat connectivity between the Ingleside Plateau and the Warriewood Escarpment be reviewed for exclusion. It is proposed:

- » a new biodiversity survey be carried out, including targeted surveys for threatened species overlooked by the Eco Logical Australia (ELA) reports
- » all future development applications covered by the Ingleside Place Strategy and that involve clearing of native vegetation should implement the Biodiversity Offset Scheme
- » effective E2 Zoned Biodiversity Corridors be designed, to adequately conserve important habitat corridors.

6.12 Cricket NSW

Cricket NSW's submission noted the large growth in the number of registered cricket participants over the last four years and Ingleside is within proximity of two of the largest clubs in the Northern Beaches, the Peninsula Cricket Club and Wakehurst Redbacks Cricket Club.

The organisation voiced strong support for the provision of additional sports fields as this provides the opportunity for more cricket playing fields. In the planning and design of the sports fields, Cricket NSW requests consideration be given to the provision of off-field and supporting infrastructure such as cricket training facilities, gender-neutral and inclusive amenities and changeroom design, shade and shelter, and access to drinking water.

Cricket NSW offered strong support for the Water Cycle Management Plan for the proposed sports fields and noted sustainability and quality of playing surfaces must be considered in the design and construction elements of the sports fields. These elements may include the type/species of grass, the composition of the soil used, and the design of sub surface drainage

6.13 Queenwood School for Girls

The Queenwood School for Girls owns two lots of land North of Mona Vale Road which it will use to establish new sporting facilities to be used by the school and the community outside of school requirements. It was noted that while the school site is not part of the proposed planning control changes, the draft strategy is accompanied by technical reports that have implications for Queenwood's proposed land use. In its submission, the School proposed that the zoning of Queenwood's land should remain SP2 Educational Establishment, with references to 'water management' be removed from the strategy, and that detailed, site specific assessments of the watercourses and riparian corridors outside the precinct (Queenwood site) should be undertaken for individual site-specific developments.

In their submission, the School recommended that the draft strategy be informed by a more detailed transport assessment, with clarification on the Bahai Temple access road (Bahai Temple Way) and confirmation that Transport for NSW is no longer pursuing the Harvey Road extension.

6.14 Elanora Heights Preschool

The Elanora Heights Community Preschool is a community based not-for-profit preschool that operates out of the Elanora Heights Community Centre and is the only community preschool that services Elanora Heights and Ingleside area.

It was noted that any development at Ingleside at the proposed capacity would place strains on not only the Preschool but also the Elanora Heights Community Centre.

In its submission, the Preschool raised concerns about potential traffic implications including:

- » that Kalang Road and nearby roads are already busy, with traffic volumes further amplified with additional residents
- » the Preschool is not subject to 40 km/h safety zones that are implemented around schools
- » any traffic study should include Kalang Road and its connection between Powderworks Road and Elanora Road.

It was proposed that the community centre (which is home to the Preschool) should be a key point of safety consideration in any traffic study.

6.15 Clareville and Bilgola Plateau Residents

This group's submission raised the following:

- » residents believe the fire exit strategy has not been adequately answered
- » residents feel the developer contributions are too low and will leave the burden of providing infrastructure to the Council and thus rate payer
- » there was agreement with Council that there are more suitable areas for development
- » residents asked that with Australia's population in decline due to low birth rates, what increase in population is being projected with the plan and over what period of time?
- » concern that there is a lack of due diligence in planning for liveability with climate change ramifications with this plan
- » the area is semi-rural with a car-dependent community with restricted routes in and out and although the plan includes some studies, the residents believe they are not thorough enough and question the outcomes.

6.16 Belrose Rural Community Association

The Belrose Rural Association is a well-established (> 25 years) local community association with the mission to advocate for appropriate development within the unique bushland setting. The group's submission included concerns about:

- reduction of habitat for flora and fauna including endangered species/ communities - potential impacts on a Coastal Upland Swamp and some unmapped parts of the Duffys Forest Ecological Community.
- increased traffic on local roads and main feeder roads that transverse the locality.
- waterways, increased runoff from hard surfaces, potential increased flooding and contamination dangers surrounding Narrabeen Lagoon.
- non-inclusion of climate change predictions for flooding, drought and bushfire events.
- inadequate escape routes and an existing bushfire risk that has not been adequately addressed.
- lack of alignment with Council's housing plan which demonstrates housing needs are accommodated in other locations.

7 Submissions from government organisations

7.1 Government Agencies

7.1.1 Environment, Energy and Science Group (EES), DPE

It was noted that EES supports the draft strategy's emphasis on creating a model resilient community and a self-sustaining, low carbon precinct, as well as protecting the environment, preserving natural and biophysical assets, including conserving, protect and enhancing bushland, creek lines and riparian corridors.

EES recommended special consultation procedures concerning threatened species under s.3.25 of the Environmental Planning and Assessment Act 1979 (EP&A Act) be utilised. Consideration should be given to pursuing biodiversity certification under Part 8 of the Biodiversity Conservation Act 2016 (BC Act), as well as an updated Biodiversity Assessment Report (BAR). Consideration of E2 zoning to be changed to SP2, RE1 or kept as RU2 with minimum lot sizes and planning controls on Asset Protection Zones.

It was noted that ongoing consultation should occur with EES and the National Parks and Wildlife Service (NPWS) in relation to development of site-specific planning provisions, Development Control Plan (DCP) and master planning, bushfire management and evacuation planning.

7.1.2 Environment Protection Authority NSW (EPA)

EPA NSW noted recognition of the work from the Department, Northern Beaches Council and RFS NSW to address the risk of land use conflict with Kimbriki Resource Recovery Facility, however raised that there are several environmental considerations that remain. The EPA noted support for the updated draft strategy's water and ecological actions, recommended that the strategy would benefit from additional key actions, such as ensuring development maintains or restores waterway health to support community values, aquatic health and recreational uses. The EPA's submission also recommended investigating and recognising opportunities to help deliver circular economy infrastructure and design and identifying opportunities to protect the community from noise and air pollutants, and land use conflicts.

The EPA also highlighted the importance of further assessment undertaken as part of a future planning process to assess the contamination status of both soil and groundwater at individual sites, in line with Guideline SEPP 55.

7.1.3 Sydney Water

Sydney Water's submission noted that servicing comments remain the same as the previous draft and that. Several water systems could service the proposed precinct. Ingleside Park reservoir (WS0267) would offer adequate operational and reserve capacity with a new booster pumping station at the site. The Ingleside re-zoning aligns with the broad wastewater servicing strategy for the area and would be serviced by the Warriewood wastewater treatment plant under its current capacity. The Sydney Water wastewater servicing options respond to three natural catchments, Warriewood Submain, the Mullet Creek Carrier, or the Ingleside Carrier. Pressure sewers may be required for some properties.

It was noted that recycled water opportunities from the Warriewood Wastewater System may be available dependant on economic and financial considerations, along with any sustainability initiatives to minimise / reduce the demand on drinking water in the precinct, including alternative water supply and end uses of drinking and non-drinking water.

7.1.4 Schools Infrastructure NSW (SINSW)

SINSW noted it is generally supportive of the draft strategy. SINSW uses population and dwelling projection data (2019) provided by the Department and anticipates that the NSW Department of Education's existing primary and secondary school sites will have capacity to accommodate the enrolment demand. Major projects are currently underway to upgrade Mona Vale Public School and the Narrabeen Education Precinct (comprising Narrabeen North Public School and the Narrabeen Sports High School) to enhance education facilities within the locality.

However, SINSW notes that increased growth will place further pressure on the surrounding road network and recommends upgraded footpaths and pedestrian crossings to allow walking, cycle lanes for cycling and other opportunities for public transport to promote active / sustainable travel. SINSW also recommends traffic calming at strategic locations, lower vehicle speeds around schools, improved bus stop access and higher bus priority be incorporated into the draft strategy.

7.1.4 Transport for NSW (TfNSW)

The TfNSW submission raised several areas of concern relating to the Strategy:

- » Mona Vale Road West Upgrade will need to be delivered within the next 5 years to cater for the additional traffic as weekday peak hour capacity would be exceeded, increasing congestion and delays. Currently, no funding or commitment exists for the upgrade
- » the Ingleside Precinct Rezoning Traffic and Transport Assessment by SCT Consulting (March 2021) does not adequately assess the impact of a reduced number of dwellings with evidence and provides many assumptions on works that it suggests are no longer required. Council needs to be consulted regarding the suggested strategies to mitigate traffic at the Powderworks Road and Garden Street intersection.
- » the regional 197 bus route will probably divert off Mona Vale Road between Powderworks Road and Manor Road only. It is possible the 182 can be modified into the area or an on-demand bus service be made available. Cycle paths are supported with a recommendation to utilise TfNSW design tools.
- » concerns relating to the limitations and exclusions of the Bushfire Evacuation Analysis. In its submission, TfNSW expressed concern that the Ingleside Precinct Bushfire Traffic Analysis Report by PDC Consultants highlights that in-person emergency services assistance cannot be guaranteed, and recommended consideration be given to unpredictable events, impact of smoke on driver behaviour, regional traffic constraints or other traffic-generating land uses.
- » to reduce evacuation risk, Powderworks Road should be upgraded and/or widened (from Mona Vale Road to Wilga Street, including intersections) to enable 2-southbound traffic lanes. The intersection of Powderworks Road / Wilga Street will become a single lane roundabout in the future and has the potential to become an evacuation capacity constraint. This intersection should implement 2-southbound approach lanes as well as 2-southbound departure lanes.
- » protection of the Harvey Road extension (which forms part of the Mona Vale Road West Upgrade) from future development.

7.2 Council

7.2.1 Northern Beaches Council

Council's submission noted it does not support the strategy in its current form for the following reasons:

- » Council engaged an independent bushfire consultant to assess the risk and Powderworks Road is only suitable when there is no fire impact. Due to bushland on the road, it may become a pinch point. Alternative evacuation routes of Wattle and Ingleside Roads are also at risk due to bushland. The remainder of the Bushfire Strategic Study is sound.

- » transport and road design needs to be shared with council to assist with shaping the DCP.
- » flooding assessment is compliant but consideration for large storm events is needed. Minimum rainwater tank size needs statutory provisions.
- » if Regional Infrastructure Contribution is not allocated to council, full proposed development is not achieved or there is no support from IPART, the significant cost to ratepayers to fund infrastructure would be high
- » Council recommends rezoning portions of land that are of significant bio-diversity value such as Coastal Upland Swamps and Angus Onion Orchid habitats. Updated flora and fauna surveys in accordance with BAM 2020 need to be undertaken. Privately owned riparian corridors should be zoned as E2.
- » Not all areas were available for the 2016 Aboriginal heritage survey and so a large assessment is recommended to ensure adequate conservation options are available, if sites are identified.
- » ability to deliver any affordable housing in line with Councils adopted policy.

8 Submissions from Industry Organisations

8.1 Property Council of Australia (PCA)

In their submission, the PCA expressed support for the draft strategy, with encouragement to revisit the development potential of North Ingleside should the bushfire risk and evacuation capacity constraint change in future. The reduction of homes from 3,400 in the LUIP to 980 in the draft strategy creates a shortfall of 2,420 homes that the PCA recommends is be allocated to other areas and precincts in the North District.

8.2 Housing Industry Association NSW (HIA NSW)

In its submission, the HIA NSW expresses support for the creation of new homes and infrastructure delivery in the Ingleside Urban Release Area, as well as for design considerations, housing diversity and infrastructure contributions. However, the HIA expresses disappointment at the lack of reference to the new SEPPs or the Infrastructure Contributions Review.

HIA NSW indicated it does not support the removal of complying development approval pathways in place-based planning controls, as channelling all approvals through the council-led development application process adds time delays and extra costs for the housing industry.

HIA noted it is generally supportive of the range of lot sizes, however policy and plan making for the release area ahead of the new Design and Place SEPP needs consideration. Whilst HIA acknowledges the need to address housing affordability, this is best achieved by increasing the supply of dwellings and reducing the cost of red tape in the planning process, rather than developer contributions and levies.

8.3 MIRVAC

In its submission, Mirvac expressed support for the well-founded Strategy but believes there is opportunity for improvement. Mirvac recommends allowing the industry to comment on important detailed built form controls and a local infrastructure contributions plan. Mirvac also expressed support for using the SEPP as the implementation mechanism and the controls within the Housing Diversity DCP as an alternative to the preparation of a DCP for the precinct.

Mirvac requested revision of the dwelling yield proposed by the draft strategy in recognition of the constraints which a number of sites have in being able to accommodate the planned density, as maximum dwelling yield is unlikely to be achieved due to heritage, ecological and infrastructure constraints. In its submission, Mirvac commented that the viability of providing affordable housing within the precinct is questionable due to:

- » the location is inconsistent with local housing strategies
- » the proximity to public transport
- » the lack of social support services that affordable housing residents generally require
- » the type of housing and planning constraints do not support delivery of products that meet affordable market needs.

In its submission, Mirvac asserts that construction of Mirbelia Parade extension needs to be completed in order for it to be recognised as the main north to south road on the western edge of the development and ensure a more efficient use of land.

It was proposed to rezone R5 Large Lot Residential in the southwestern portion to R2 Low Density Residential to better correspond with bushfire hazard and egress opportunities. The ability to construct a home on the residual

RU2 zoned areas on Wilson Avenue along with an ability to subdivide these residual RU2 zoned areas even though they will be less than the minimum lot size of 2Ha. Mirvac also recommends mechanisms be developed to allow the transfer of the planned riparian corridors into public ownership, and minor mapping amendments be made, to reflect the current proposed extent of riparian corridors in the precinct.

Mirvac proposes the North Ingleside be considered in a staged, well planned development to further mitigate bushfire risk, with improvements to Powderworks Road to assist in egress, as well as bushfire hazard mitigation measures.

9 Feedback on supporting papers

Several supporting reports were addressed in relation to the draft Place Strategy. Feedback on detailed reports was provided in 71 submissions (8%), with some of the following comments on each paper mentioned below.

Ingleside Bushfire Evacuation study – Traffic Assessment, AECOM **1 July 2020**

This technical study was commissioned to establish through traffic modelling and potential for additional development based on the ability to evacuate in a bushfire emergency. A small number of submissions highlighted discrepancies between AECOM's study and the current draft place strategy, including:

- » an increase in development for Areas 3 and 5 is not supported under the traffic modelling.
- » any additional development across Ingleside is only supported if there is an on-site emergency services role to manage the road network.
- » the model study area terminates south east of the Powderworks Road intersection with Kalang Road, and therefore potential congestion at Garden Street has not been assessed or considered.
- » the traffic assessment is outdated, as surveys of existing traffic flow were conducted during private school holidays when traffic flows were lower than normal.
- » there is no consideration for potential congestion from Powderworks Road intersection with Garden Street, or Garden Street intersection with Pittwater Road.

Ingleside Precinct Bushfire Traffic Analysis Report, PDC Consultants **23 March 2021**

Submissions raised concerns about the assumptions in the PDC Bushfire Traffic Analysis Report, including:

- » no consideration of broader network traffic implications of a bushfire event, such as vehicles from neighbouring fire affected areas.
- » strong reliance on remote emergency warning without consideration to power outages or technology failure.
- » lack of comment on the ability of firefighting or other emergency vehicles to access properties.

The Eco Logical Australia Reports (ELA) **4 March 2020**

Submissions raised concerns about the adequacy of assessments of the ecological outcomes of the proposed land use changes, including.

- » lack of acknowledgement of the Duffys Forest Endangered Ecological Community.
- » wildlife records analysis is only based on data received up until 2016, therefore missing 5 years of data and newly listed threatened species.
- » the summary of 'access and no access lands' show only 50% of the entire area study was properly studied.
- » lack of discussion of how much habitat for threatened species would be affected, lack of consideration of the indirect impacts of intensified land use.
- » lack of measures to avoid and minimise impacts on land with biodiversity, as encouraged within the Biodiversity Certification Assessment Report.

10 Conclusion

This consultation outcomes report summarises the feedback received in all submissions made by stakeholders during the public consultation period for the Ingleside draft Place Strategy Consultation Outcomes Report.

A total of 922 submissions was received from stakeholders across government, local organisations and the community. Many submissions raised concerns about the aspects of the proposed draft strategy, and most submissions expressed the view that additional or improved infrastructure was required before any additional housing was introduced into the area.

Key feedback noted includes:

» **Unsuitable road infrastructure**

Road infrastructure, particularly the potential for increased traffic on Powderworks Road, was a significant concern to the community. Concerns include that an increase in density will increase traffic which is already perceived to be at-capacity, and there were particular concerns about the impact of increased traffic on the capacity to evacuate potential future bushfires.

» **Environmental sustainability**

Loss of the natural environment due to increased density, rezoning of parts of the wildlife corridors riparian zones would impact negatively on native flora and fauna, especially endangered species in the area.

» **Housing density**

Concerns included that Wilga Street is a 'compressed area' with one road in and out, making it unsuitable for increased density.

The report records the key sentiments and breadth of views of the stakeholder consultation process. It does not represent every individual comment made by stakeholders, which were addressed during community consultation events.

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