
From: Dick Clarke
Sent: 7/10/2025 7:57:27 PM
To: Council Northernbeaches Mailbox
Cc: Kate Mercieca
Subject: Submission re PEX2025/0001 from Sustainable Northern Beaches
Attachments: SNB Wilga-Wilson Response 2025-10-07.pdf;

To whom it may concern,

Please find attached Sustainable Northern Beaches' submission in response to the Wilga-Wilson precinct planning application PEX2025/0001.

Thank you for making it available for review.

Yours,

Dick Clarke



on behalf of Sustainable Northern Beaches
(a subcommittee of Climate Action Northern Beaches)

Submission by **Sustainable Northern Beaches** (a committee within Climate Action Northern Beaches Inc.)

To a Planning Proposal for Wilga-Wilson precinct

Lodged with Northern Beaches Council in September 2025 by Mirvac, Tusland and others.

Introduction

This submission to Northern Beaches Council is made by Sustainable Northern Beaches (SNB), and contains an analysis and response (Response) to the Planning Proposal and Planning Report submitted to Northern Beaches Council for a rezoning and redevelopment of the Wilga-Wilson precinct in Ingleside (the Proposal, and Report).

This Response is based on documents found via the Council 'Your Say' link, at these URLs:

<https://yoursay.northernbeaches.nsw.gov.au/planning-Proposals>

and then

<https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Public/XC.Track/SearchApplication.aspx?id=2632480>

SNB is not opposed to any or all redevelopment of the Wilga-Wilson precinct, but if it is to occur it must be done well, and be at least equal to accepted best practice, if not better. We note that at least one of the proponents has been awarded for their leadership in the field of urban development in the past. Ad hoc spot rezonings have a well-earned reputation for being bad planning practice.

In its present form, this Proposal falls short of those lofty standards due to the scale of Proposal. 536 dwellings is too many in that location, and 6 storey towers are completely out of place in what will remain peri-urban surroundings.

The recent previous NSW Minister for Planning, Dr Rob Stokes, envisaged Ingleside as being a "lighthouse development" of sustainability. In its present form the Proposal breaks no new ground in sustainability for energy, water or building standards, and if approved would provide very mediocre – if compliant – lifestyles for residents. Compliant is merely that which is just above illegal – it sets no new standards, is no lighthouse, is just more of the same.

However this Proposal is actually worse than that, by proposing disconnected density.

Removing the apartment tower blocks, adding some more small lots or smaller two storey townhouses, and distributing the open space out in two or three well equipped parks of 1,500 sq.m each would be a much better outcome, and would be supported.

There should be a mix of dwelling types and sizes that reflect the broad demographics of the district. There is a tendency for developers to build smaller units as a means of increasing their profit margin, but this does not serve the community well. A larger number of 3 bedroom units with larger or multiple living areas is needed to meet the demand for housing from young families.

It is noted that there appears to be a mismatch in the Proposal between the floor areas outlined and the floor space ratios (FSR) proposed. Council should query this with the applicant.

A. Planning documents referenced

Because the Planning Proposal proposes an amendment to the Pittwater Local Environment Plan 2014 (PLEP 2014), and is proposing its own Development Control Plan in place of the Pittwater 21 DCP (P21 DCP), this Response does not use the framework contained in the PLEP 2014 and P21 DCP.

Therefore this analysis examines impacts from first principles and current evidence. In doing so we respond to the following documents submitted to Northern Beaches Council under PEX2025/0001:

1. Indicative Concept Plan, prepared by Place Design Group, dated 06-08-2025
2. Planning Proposal Report - PEX2025/0001 - PP-2025-1457, prepared by GLN, dated 06-08-2025

However, the Locality Statements contained in sections D5 Elanora Heights and D6 Ingleside are used as a basis for the analysis here, since these have been agreed after years of community consultation. What justification can there be for discarding these *Statements* without due consultation with the community?

Regardless of the Proposal sitting within Ingleside's suburban boundary, this Response is framed principally through the lens of the Elanora Heights Locality Statement in P21 DCP section D5 because any urban residential development in Wilga-Wilson precinct will become a default adjunct to Elanora Heights, since that is where the closest services and shops are located, it is where the proposed road connections lead, and the urban character is divorced from the peri-urban character of Ingleside.

1. Notification problems

It is understood and appreciated that Council has no legal obligation to notify the community when assessing a Planning Proposal. However, a proposal of this magnitude and potential effects needs much broad based reflective analysis, and in that light the timeframe for lodgement of feedback is unreasonably short. This is a Proposal to create a whole new suburban precinct.

Additionally, the notification area (shown red hatched in council correspondence) is both limited and inadequately targeted: residents and businesses in every street in Ingleside and Elanora Heights, and many in North Narrabeen are affected and should be given the opportunity to respond; many areas shown hatched are open space with no residents or businesses. The reasons for this are discussed below under Traffic.

If this proposal was to progress to the next phase of assessment - and we recommend strongly that in its current form it does not - then the notification area must be expanded to include all of Ingleside, Elanora Heights, and that part of North Narrabeen west of Pittwater Road.

2. Towards 2040 – a Trojan horse?

This strategic planning document is referenced in the Proposal as a guising document for dense urban development in Ingleside, but ignores the reasons for refusal of the previous concept in 2021. The Proposal states:

“The North District is a unique place in Greater Sydney, where bush meets beach meets

city. Strong, sustainable planning will guide and create a 20-year model to deliver a thriving modern economy co-existing within beautiful natural landscapes.”

This and the wording in other sections (eg. P.24 and others) implies that the Proposal is the first piece in a 20 year project to provide dense urban development across the whole of Ingleside, making the Wilga-Wilson precinct the ‘trojan horse’ that would establish the precedent by which the remainder of Ingleside would be rezoned for as R3 dense urban.

Yet on p.28 the Proposal states the opposite in its description of what currently makes Ingleside unique and attractive:

“Ingleside is a place of natural beauty, surrounded by bush and open space and farmland » leafy and spacious » quiet and peaceful » semi-rural, yet close to the beach”

The proposal irrevocably changes that character, undermining what makes the location attractive.

The Planning Report states “It seeks to rezone the Site to predominantly permit low to medium density residential housing,” (Proposal p.vii) We submit that five 24m six storey apartment blocks and massed 11m three storey terrace housing, in the context of what will otherwise remain as peri-urban, is more than medium density, it is high density.

Applying an extension of the logic used in the Proposal the Elanora Heights village centre (and others in the Northern Beaches LGA) should be rezoned R3 and at least 6 storeys allowed, with 3 and 6 storeys down Powderworks Rd and surrounding residential streets. Clearly that would be overdevelopment that could not be supported – but where is the logical line drawn?

A cohesive masterplan is needed for the whole of Ingleside that is consistent with the Towards 2040 strategy, that obviates the need and opportunity for ad hoc spot rezonings.



Aerial image of the NB LGA showing appropriate locations for increased density, with Ingleside seen as an inappropriate outlier
[© Google Earth, annotations ours]

3. Environment and Climate Change Strategy 2040 (CCS) - This council policy sets out many critical sustainability 'Goals and Commitments' as a trajectory for change, including:

3.1. Reducing our carbon footprint - the Proposal has no stated means of achieving this critical ambition. Useful and practical commitments should include:

3.1.1. Commit all buildings to be at least NatHERS 8 stars or Certified Passivhaus;

3.1.2. Commit all suitable roofing areas to have photovoltaic panels installed;

3.1.3. Commit to either a battery backed micro-grid, or to batteries in each dwelling;

3.1.4. Commit to Councils commitment to sustainable communities as per CCS p13: *"Where growth is needed we will design our new houses to be sustainable and resilient and to create liveable communities that integrate the built and natural environment"* also refer to CCS Theme 7.

3.2. Electric vehicle charging infrastructure - the development should encourage the transition away from internal combustion engined vehicles to EVs by committing to EV chargers in all buildings, and publicEV charging on streets.

3.3. Rainwater harvesting beyond BASIX - the nominal rainwater harvesting requirements contained in the BASIX SEPP should be exceeded by approximately 100%. This is still a modest volume but will help reduce mains demand significantly, without having a deleterious effect on water flows in Mullet Creek.

3.4. Waste management - Council has committed to the progressive reduction of household and other waste streams. The Proposal has no mention of waste management. We suggest including an efficient waste management program to limit the level of waste going to landfill.

We reference the Northern Beaches Waste and Circular Economy Strategy 2040:
Direction 1.Reduce waste per person by 20% by 2040, 75% resource recovery by 2040,
Direction 2. Halve the amount of household food waste by 2030,
Direction 3. Collect and recycle all plastics.

4. Pittwater 21 DCP Ingleside locality statement - *desired future character*

P21 DCP Section D6 Locality specific development controls – *D6 Ingleside* states:

Outcomes

To achieve the desired future character of the Locality.

To ensure new development responds to, reinforces and sensitively relates to the spatial characteristics of the existing built and natural environment. (En, S, Ec)

*To enhance the existing streetscapes and **promote a scale and density that is in scale with the height of the natural environment.***

*The **visual impact of the built form is secondary to landscaping and vegetation**, or in commercial areas and the like, is softened by landscaping and vegetation. (En, S)*

High quality buildings designed and built for the natural context and any natural hazards. (En, S)

Buildings do not dominate the streetscape and are at 'human scale'. Within rural residential areas, buildings give the appearance of being two-storey maximum. (S)

To preserve and enhance district and local views which reinforce and protect the Pittwater's natural context.

To enhance the bushland vista of Pittwater as the predominant feature of the landscape

with built form, including parking structures being a secondary component.

To ensure that development adjacent to public domain elements such as waterways, streets, parks, bushland reserves and other public open spaces, compliments the landscape character, public use and enjoyment of that land. (En, S)

(relevant clauses shown in **bold**)

- 4.1. The key theme in this Ingleside locality statement is that buildings are not to be the dominant feature, taking second place to landscape. It specifically states that all buildings should appear to be no more than two storeys in height, which is universally accepted as being approximately 8.5m above adjacent natural (pre-development) ground levels.
- 4.2. The Proposal includes five six storey apartment blocks, which is in clear breach of the intent of the current Ingleside desired future character as contained in *D5 Ingleside* above.
- 4.3. The Proposal contains approximately 300 other house lots that could conceivably be developed to be consistent with the locality statement *D5 Ingleside*.

5. Pittwater 21 DCP Elanora Heights locality statement - *desired future character*

P21 DCP Section D6 Locality specific development controls – *D6 Elanora Heights* states:

Outcomes

To achieve the desired future character of the Locality.

*To ensure new development responds to, **reinforces and sensitively relates to the spatial characteristics of the existing built and natural environment.** (En, S, Ec)*

*To **enhance the existing streetscapes and promote a scale and density that is in keeping with the height of the natural environment.***

*The **visual impact of the built form is secondary to landscaping and vegetation**, or in commercial areas and the like, is softened by landscaping and vegetation. (En, S, Ec)*

*High quality buildings **designed and built for the natural context and any natural hazards.** (En, S)*

***Buildings do not dominate the streetscape and are at 'human scale'.** Within residential areas, **buildings give the appearance of being two-storey maximum.** (S)*

*To **preserve and enhance district and local views which reinforce and protect the Pittwater's natural context.***

*To **enhance the bushland vista of Pittwater as the predominant feature of the landscape with built form, including parking structures, being a secondary component.***

To ensure that development adjacent to public domain elements such as waterways, streets, parks, bushland reserves and other public open spaces, compliments the landscape character, public use and enjoyment of that land. (En, S)

(relevant clauses shown in **bold**)

- 5.1. The key theme in this Elanora Heights locality statement is that buildings are not to be the dominant feature, taking second place to landscape. It specifically states that all buildings should appear to be no more than two storeys in height, which is universally accepted as being approximately 8.5m above adjacent natural (pre-development) ground levels.
- 5.2. The Proposal includes five 6 storey apartment blocks up to 24m high, and a majority of the site covered by an 11m height plane, which is in clear breach of the intent of the current Ingleside desired future character as contained in *D6 Elanora Heights*, above.
- 5.3. The Proposal contains approximately 300 other house lots that could conceivably be developed to be consistent with the locality statement *D6 Elanora Heights*.

B. Analysis of impacts

5. **Height of buildings** – The Proposal includes a Height of Buildings map (paragraph 6.3 on p.31-32 of Planning Report), that shows areas of 11m and 24m building height within the proposed R3 zone, and following on from that a changed Floor Space Ratio (para 6.4 on p.32-33 and other referenced pages).

- 5.1. **The Desired Future Character' statement** contained in the current PLEP 2014 (discussed above) states for both Ingleside and Elanora Heights that building should give the **appearance of 2 storeys**. These character statements were crafted after long and very effective community consultation, and have been accepted by the local community.

To so dramatically change that desired future character requires at least the same process of broad community consultation, without which **Council has no mandate** to make such change. The very limited consultation in area notified and time available to respond **does not qualify as equivalent consultation**.



3D CONCEPT MODEL (SUPPLIED) WITH PROPOSED BUILDING HEIGHTS HIGHLIGHTED:
RED - 24m; YELLOW - 11m.

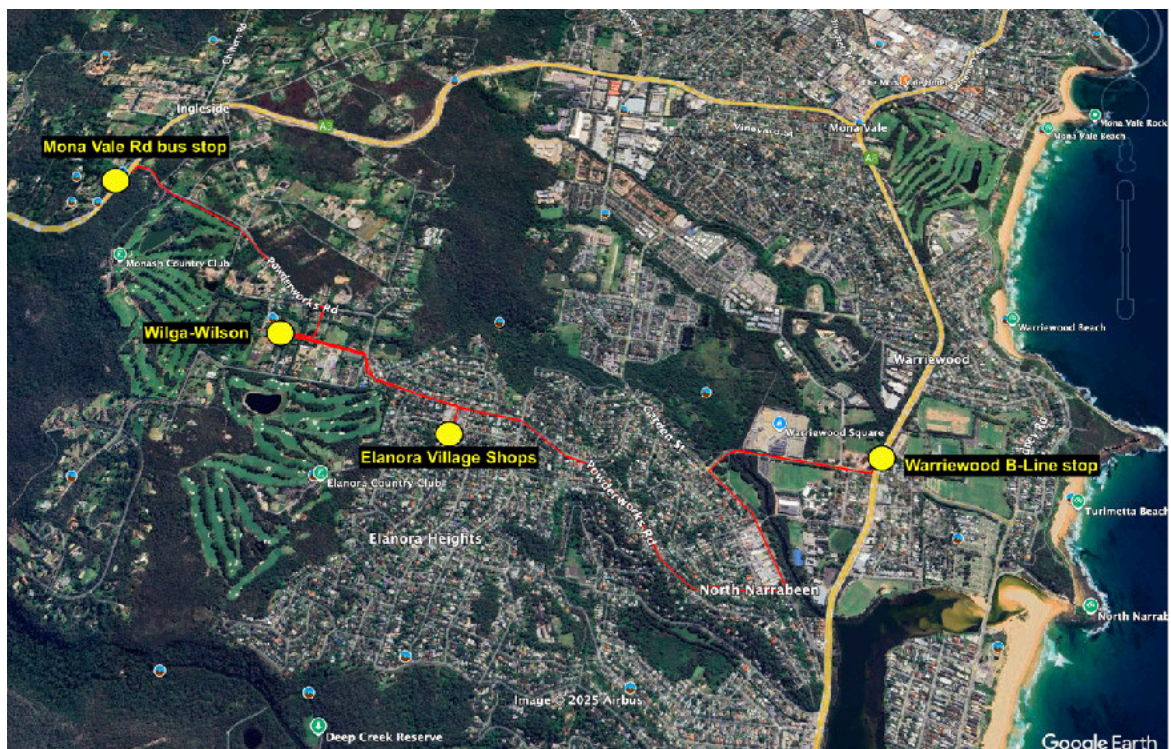
[Image from Proposal, highlighting ours]

- 5.2. **Affordable housing provisions currently contain a loophole that would allow an extra two storeys – to 8 storeys-** to be applied for and approved after initial Planning or Development Consent is granted. This anomaly in the otherwise well intentioned legislation makes a mockery of height limits that might be otherwise agreed.

It must therefore be assumed that this loophole will be pursued, and is one more reason to limit overall building heights to 8.5m as per the current DCP.

6. **Transport** – The Wilga-Wilson precinct is too far from shops and services to support the density proposed. There is no timetabled public transport close by, and no cycleways (note that Powderworks Road is a very dangerous cycling route). The centre of the proposed masterplan, where the six storey towers are located, is over 1km from Elanora shops bus stops, and 1.7km to the bus stop on Mona Vale Rd.

- 6.1. **Buses** - The nearest timetabled bus service is the Sydney Buses route 182 at Elanora shops, which runs once per hour in each direction. Because the service is so sparse, it is poorly patronised, with most residents opting to use their cars. Footpaths to Elanora are adequate but the distance is too great. NSW Government guidelines for increased urban density such as this states that it should be within 400m of regular transport services.
- 6.2. **Keoride** - The Keoride 'on demand' shuttle service has not been upgraded to match demand in recent years, such that it is now more of a 'semi-timetabled' service, with wait times up to 40 minutes in peak periods. Larger buses running less often have replaced the original mini-buses, rather than increasing the number of smaller vehicles to meet the growth in demand. This has led to many previous patrons reverting to their cars, and it is certain that Wilga-Wilson residents in this Proposal will do the same.
- 6.3. **Active transport** – walking cycling have limited safe options in this location.
- 6.3.1. **Walking** – footpaths down to Elanora Shops are adequate, but there are none uphill to Mona Vale Rd. In fact Powderworks Road west of Wilga St is extremely dangerous and unforgiving for pedestrians.
- 6.3.2. **Cycling** – because only children under 12 years old are allowed to ride on footpaths (or adults supervising), and that there are no cycleways in Elanora Heights or Ingleside, many cycling journeys will be on the Powderworks Rd carriageway. This road is narrow, with 'traffic calming' devices actually forcing cyclists and motor vehicles to share the same road space with little or no warning. For this reason, we suggest that cycling is not an option for Wilga-Wilson.
- 6.4. **Car dependency** - For these reasons it is clear that all dwellings will be very car dependent and therefore hundreds of car movements will occur to service 536 dwellings. Assuming that each dwelling has (only) two cars (we note the Northern Beaches average is higher than this), that is potentially more than 1,000 vehicle movements each day. The impact is discussed below in Traffic.



Aerial photo showing Powderworks Rd route from Wilga-Wilson to:

- Mona Vale Rd bus stop, Route 196,197 hourly services - 1.7km
 - Elanora Heights village shops, Route 182 hourly service - 1.1km
 - Warriewood B-Line stop, 10~20 minute services - 4.25km
- [Image & distance measurements © Google Earth, annotations ours]

7. **Bushfire risk** – The Proposal references a Strategic Bushfire Hazard Study, which states that the precinct has a “moderate bushfire risk”, and that future development can comply with the requirements of *Planning for Bushfire Protection 2019*. **This contradicts the RFS report from 2021-22 that ranked the risk of fatalities as high.**

Analysis and comments below refer also to the 2018 Meridian Urban report: *Bushfire Risk for the Ingleside Planned Precinct*. Reference is also made to a submission to the then NSW Dept of Planning & Infrastructure by CR Bushfire, dated 23 July 2021 (copy can be supplied upon request).

- 7.1. The precinct is surrounded by bushfire hazard on most sides and was partially burned in the 1994 Cottage Point bushfire, evidence that the precinct is exposed to a very high risk from radiant heat, smoke and embers.
- 7.2. The Meridian Urban report states on p.65 that “The likelihood of extreme fire weather in and around Ingleside is considered ‘almost certain’”. Page 117 states that the danger to life and property from ember attack on South Ingleside “was extreme, based on stakeholder accounts and the 1995 Coronial Enquiry.” This statement is backed up by the personal experience of several members of Sustainable Northern Beaches.

The Meridian Urban report forecasts climate change increasing these risks in frequency and intensity.

- 7.3. While the individual buildings can certainly be designed to comply with *PBP-2019*, using the building design and material standards set out in *AS 3959 Construction of buildings in bushfire prone areas, 2018*, the evacuation out of the precinct is a different risk.

It is inconceivable that the reasons for the 2021 refusal of the previous Ingleside redevelopment can be ignored when the density (number of persons needing to evacuate) is higher than was proposed in that previous scenario.

- 7.4. The previous scheme was refused by the RFS with additional advice from NSW Police Traffic and Highway Patrol on the basis that mass evacuation by private cars could not be safely managed given the constraints of Powderworks and Mona Vale Roads.

Nothing about Powderworks Rd or adjacent rat-runs has changed, and will not change for the reasons discussed above. This is reason enough to revise the scale of the Proposal to discard the tower blocks.

- 7.5. **A fully detailed and peer reviewed bushfire evacuation plan is therefore required.**

8. **Traffic and transport impacts** - Powderworks Rd is a narrow one lane each way road, that is a significant link road between Mona Vale Rd at Ingleside at its top western end, through Ingleside and Elanora Heights, to North Narrabeen and Pittwater Road at its bottom eastern end. It cannot feasibly be widened without a billion dollar property buy-back and reengineering process – this is not conceivably going to happen, and without a total revolution in how society chooses to get around, this road imposes immutable limits on vehicle movements.

- 8.1. **Powderworks Road already beyond capacity** - The Proposal's Planning Report and traffic study states:

The findings demonstrate that each of the seven intersections perform well under current conditions.

This is patently untrue. Any simple observation will show that Powderworks Rd is at and beyond maximum capacity at both its western and eastern ends each morning and afternoon peak period. Long queues of cars waiting to enter Mona Vale Rd and Garden St/Pittwater Rd occur every weekday AM and PM peak. Weekends now see similar queues all day.

Powderworks Road cannot cope with any increase in daily traffic in peak periods, including peaks at any time of day or night created by evacuation orders (see below).

- 8.2. **Bushfire evacuation** – Evacuation will rely on private cars, and mass exodus will inevitably cause massive congestion impeding safe egress. This was a major reason the previous subdivision Proposal was rejected, and this situation has not changed. This is reason enough to refuse the current Proposal.

- 8.2.1. The Proposal's Planning Report states:

The Site accommodates riparian corridors which have the potential to expose some dwelling to bushfire hazard risk. However, the construction of buildings to the relevant BAL rating will ensure that residents can continue to reside within their dwellings during a bushfire event. In the instance occupants evacuated the Site, the assessment predicates that 288 vehicles would travel along Powderworks Road in the hour leading up to the event. The assessment confirms that Powderworks Road has capacity to support this level of traffic generation. Occupants will evacuate the Site by travelling east along Powderworks Road which is exposed to minimal bushfire hazard due to the absence of dense bushland.

- 8.2.2. It may be possible for the buildings to resist ignition assuming they are actually built and certified to be compliant with AS 3959, but without hepa-filtered ventilation systems in air-tight buildings such as Passivhaus, it will be unsafe for residents to stay due to heavy smoke ingress into 'BASIX only' compliant dwellings – which have no air-tightness or mechanical ventilation requirements. Therefore residents will be advised to leave by Police and NSW Health, as happens in every similar fire event.

- 8.2.3. Evacuation from 536 dwellings will actually result in between 536 and 1,072 cars, since we have shown that it can be safely assumed each dwelling will be car dependent, and many will rely on more than one car. In reality Powderworks Rd cannot cope with an extra 288 cars in addition to the hundreds that will be evacuating from greater Ingleside, and the western streets of Elanora Heights.

The proposed roundabout will act as a bottleneck to all other traffic in Powderworks Rd during a mass evacuation.

The real number of cars attempting to exit the area eastwards in the theoretical hour (as per their Report) will be between 1,200 and 1,500. The eastern end of Powderworks Rd at Garden St and Pittwater Rd cannot cope with this number of vehicles.

- 8.3. **Rat runs** – Various 'rat runs' are already used in Ingleside and Elanora Heights to avoid bottlenecks at each end of Powderworks Rd, and an extra 536 dwellings will exacerbate this situation.

8.3.1. Ingleside rat runs – in the morning peak, Manor Rd is used by commuters in an attempt to circumvent the Powderworks Rd lights at Mona Vale Rd. It is also used as the most direct route to Mona Vale.

8.3.2. Elanora Heights rat runs – Elanora Rd to the Wakehurst Parkway is the most direct route to the city, in spite of its ‘Russian roulette’ reputation (and regular truck blockages). Woorarra Ave and Bristol Lane are also used to access North Narrabeen.

8.3.3. North Narrabeen rat runs – Warraba Rd and The Crescent are used to avoid the Garden St bottlenecks in both AM and PM peak periods.

8.3.4. Rat run summary – none of the residents and business on these ‘rat run’ streets want or need any increase in this traffic. Clearly an extra 1,000+ vehicles will only exacerbate this situation.

8.4. Transport emissions & net zero targets – Proposing a brand new development in 2025 that will exacerbate transport emissions, when we need to be creating development that reduces these.

8.4.1. The transport sector is Australia’s third-largest and fastest-growing source of greenhouse gas emissions,¹ currently constituting 21% of total emissions, and trending to become the highest emitting sector by the end of the decade (Department of Climate Change, Energy, the Environment and Water 2023). Road transport makes up 86% of all transport emissions, which includes 63% from passenger cars and light commercial vehicles.

8.4.2. Locating a high density residential development so far remote from mass transit options and with such limited active transport options makes no sense - it fails ‘good planning 101’. A better and preferred alternative proposal is shown at the end of this submission.

9. Local shopping and services limited – Ingleside has no shopping centre or services, so all demand for costs services will fall to Elanora Heights village shops. Further services are available at Warriewood Square, North Narrabeen and Mona Vale.

9.1. Elanora Heights village shops - These have limited parking, which is currently over-subscribed at peak times, and would not cope with a thousand or more extra residents. Local businesses always welcome extra patronage, but 1,000 extra residents attempting to access shops and services will be overwhelming. Even the IGA supermarket would struggle to safely deal with such an influx of customers. Medical services in Elanora Heights are at capacity, and there is currently limited space for extra GPs etc.

9.2. Warriewood Square and North Narrabeen – These large shopping centres certainly have capacity for over 1,000 extra patrons, but getting there from Wilga-Wilson creates the traffic problem discussed above. Many motorists heading down Powderworks Rd to Warriewood Square use the Warraba Rd/The Crescent as a ‘rat run’ to avoid the last part of the Garden St bottleneck, which is inconvenient for the many business and residents in those streets.

9.3. Mona Vale – Mona Vale’s expanding town centre status will allow for the extra patronage that would arise from 536 new dwellings, but access from Wilga-Wilson would need to be via Manor Rd and Mona Vale Rd to avoid the Powderworks Rd problems discussed above. Residents of Manor Rd should therefore be consulted. The existing

¹ <https://www.climateworkscentre.org/wp-content/uploads/2024/06/Decarbonising-Australias-transport-sector-Report-Climateworks-Centre-June-2024.pdf>

turning lane and traffic lights at the Manor Rd-Mona Vale Rd intersection would need to be upgraded to cope, needing Transport for NSW's consultation and cooperation.

- 9.4. **Terrey Hills** – It is possible some residents who commute westwards may use Terrey Hills shops and services instead of those further east, but this is uncertain and cannot be used to argue that the extra traffic will not impact Powderworks Rd.

10. **Building height** - the proposed 24m six storey apartment blocks and massed 11m three storey terraces are out of character with the surrounding peri-urban and bushland context. Multi-storey buildings are naturally sited in dense and highly urbanised contexts, which on the Northern Beaches can be found in Brookvale, Dee Why, and Mona Vale.

- 10.1. Ingleside and Elanora Heights (beyond the village centre) are completely unsuited for buildings of six storeys and 24m height. Elanora Heights village 'shop-top' housing height limits are less than half this - refer *D5.22 Ceiling Height - Elanora Heights Village Centre*.

- 10.2. There is no urban centre to provide appropriate scaling of such buildings. The Proposal creates a small isolated 'local park' around the open space between the towers with no *raison d'être*, no 'heart'. This will also be overshadowed in winter and unlikely to be a pleasant space in summer.

- 10.3. Maximum building height should be 2 storeys or 8.5m, consistent with RU2 and R2 zoning in the surrounding area.

11. **Riparian zone protection** - is less than the Australian Standard in at least one location (adjacent proposed Lot 185 etc).

- 11.1. The Wilga-Wilson precinct sits between Ingleside Chase Reserve and Garigal National Park. The precinct's riparian zones provide habitat and enable much needed connectivity between these two significant reserves.

This connectivity should be improved with wider riparian zones. The streams here are an important component of ecosystem health, necessary for birds, terrestrial fauna, aquatic animals and macro-invertebrates. Their contribution to the ecosystem is dependent on the water quality in the streams.

The precinct is the source of the south-west arm of Mullet Creek, flowing through Ingleside Chase Reserve, Warriewood Wetlands and to the ocean via Narrabeen Lagoon. Consequently, water quality of the streams within the precinct has an effect on the environmental values of local and downstream habitats. Therefore water quality must be maintained at the highest level.

Therefore, the following issues must be addressed:

- 11.1.1. **Wide and effective riparian zones** be planted with local native vegetation through the precinct.
- 11.1.2. **Water Sensitive Urban Design** principles be applied to control and treat polluted runoff and retain natural flow regimes.

- 11.1.3. **Sewer infrastructure** be designed and located so as to prevent overflows into the riparian zones and watercourses.
- 11.1.4. The precinct development process includes the provision of **high-quality erosion and sediment controls**.
- 11.1.5. **Vehicle crossing structures** over creeks must **not impede movement** of fauna through the precinct.
- 11.1.6. **Restoration** of the watercourses be undertaken.

11.2. Regeneration of vegetation and habitats within the precinct - as acknowledged on p.36 of the Proposal's Masterplan Report there is significant weed infestation within the precinct. Besides the damaging effect weeds have on native habitat within the precinct, weed propagules cause infestations downstream as far as the heritage listed Warriewood Wetlands.

11.2.1. The Biosecurity Act 2015 requires landowners to take action on weeds. If development of the precinct proceeds, it would be a unique opportunity to remove weeds and replace them with local native plants.

11.2.2. The riparian zones and the Red Bloodwood and Scribbly Gum open forest have conservation potential so should be regenerated and be placed in public ownership to be managed as conservation lands.

12. Schools and social infrastructure - The Planning Report references a *Social Infrastructure Needs Assessment* (p.2) which makes certain recommendations, but the Proposal is general in nature and includes no details on how these will be implemented. It has no specific detail or quantification of what resources will be needed, where they will be located, or commitment to how they will be funded. History has shown that vague proposals allow for slippage in actual implementation.

12.1. Increased population will create pressures on existing Social Infrastructure (SI).

The Proposal largely suggests catering for this growth by re-allocating the burden of supply on to existing facilities in other nearby areas, or by claiming that extra services are "unlikely to be needed". Other facilities are often at- or over-capacity already, because of the failure to provide SI for past developments. Other facilities may be available but not easily accessible from Wilga-Wilson. If other developments adopt the same approach, no extra facilities will be built, and reasonable community expectations will not be met - the whole community life will be poorer as a result.

12.2. The national *Social Infrastructure Audit 2019*² shows that SI is comprised of the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities. It helps us to be happy, safe and healthy, to learn, and to enjoy life. Our communities need high-quality infrastructure across six social sectors: health and aged care, education, green and blue recreation space, arts and culture, social and affordable housing, justice and emergency services. While it is not practical for any one development to provide all of these, a development of the scale in this Proposal should be making more of a contribution than the small 'local park' shown.

12.3. The Northern Beaches growing and ageing population, with the increased urbanisation in the Proposal, migration, advancements in technology, and the changing

² *Social Infrastructure Audit 2019* - <https://www.infrastructureaustralia.gov.au/sites/default/files/2019-08/Australian%20Infrastructure%20Audit%202019%20-%206.%20Social%20Infrastructure.pdf>

nature of work will increase demand for social infrastructure, and change the expectations people have for the variety, quality and accessibility of social infrastructure services and assets.

12.4. The only social infrastructure included in the Proposal is the small ‘local park’ located between the residential tower blocks. This provides nothing beyond open space, or at most some basic playground equipment. Otherwise it simply adds to the demands already placed upon the social infrastructure in the Pittwater area.

12.5. The Proposal states estimates that only 88 children will be resident. No method is shown explaining how such a low number has been arrived at.

12.6. The current average household size in Elanora Heights is 3.2 persons (ABS data: <https://www.abs.gov.au/census/find-census-data/quickstats/2016/SSC11389>) and the average children per is 1.9 children, (Elanora data used here for the reasons discussed above in the introduction to part A of this Response, above). Therefore a more realistic estimate of the number of would be 1,018 children (536 dwellings x 1.9 average children in each). Has the Proposal applicant canvassed the ability of local schools to cope with the extra demand? Increased enrolments in public schools are always welcome, but if not planned for will create chaos.

12.7. Children need to be able to safely move around the community. The Proposal’s design would allow for relatively safe internal movement of children (walking, playing, riding bicycles etc) IF the streets’ speed limit was to be set at 20kmh or less. But providing safe access beyond the precinct, to Elanora Heights shops and school, via the only existing footpath on Powderworks Rd is impossible.

12.8. An initial investigation based on ABS statistics and other sources indicates that over \$50m will be required to provide the necessary SI, due to:

- 12.8.1. 1500 extra car trips per day;
- 12.8.2. 300 bus trips per day;
- 12.8.3. 9 new school classrooms will be needed;
- 12.8.4.all quantities calculated using on commonly accepted SI demand methodology.

13. Wastewater – The Site is located within the Outer Sydney Coastal Water Development Service Plan (DSP) area. The applicant’s Planning Report states that a new trunk wastewater main and associated infrastructure will be required subject to approval by Sydney Water, and that additional upgrades between the precinct and sewer pump station SP0388 may be required as well as additional trunk wastewater infrastructure.

The Proposal makes no mention of how that will be achieved, and what disruption and/or demolition/reconstruction of downstream properties or assets will occur for it to be achieved. Without a concept plan for the whole of the works associated with the Proposal the documentation is incomplete and its total environmental, economic and social costs cannot be assessed.

14. Recycled water opportunity missed – The applicant’s Planning Report “*confirms that recycled water is not required.*” This is a wasted opportunity to achieve water sustainability beyond minimum allowable. We restate that we are supportive of development that achieves high standards, but simply adding to demand for water from Sydney Water’s existing dam supply is not a high enough standard.

C. Further issues

15. **Ownership** - Additional complications for the applicant concern other property owners. From p.31 of the Proposal: *"Other sections within the site are owned by different parties. Since these developments are not recent, it is assumed that the majority of owners will participate in the redevelopment of their land in the future in line with the masterplan. Regardless, it has been important to establish a holistic view of the proposed development outcome for the Precinct."*

It is therefore unclear how this Proposal can actually occur if not all property owners are on board.

16. **Developer risk and returns** – It is understandable that Mirvac and Tusland want to see some return on the investment they made prior to 2021, but the ‘world owes no one a living’ as the old saying goes. Investing in land that was always subject to uncertain processes is a risk all developers take – mostly they win, sometimes they lose, or at least don’t win to the extent expected: the land in Wilga-Wilson has increased in value beyond bank interests rates, so selling the land at current value would not be a loss.

However, we believe that the developers can still make a useful return on that investment, whilst also providing high value housing. Removing the apartment tower blocks, and spreading the open space out in two or three well equipped parks of 1,500 sq.m each would be a much better outcome, and would be fully supported.

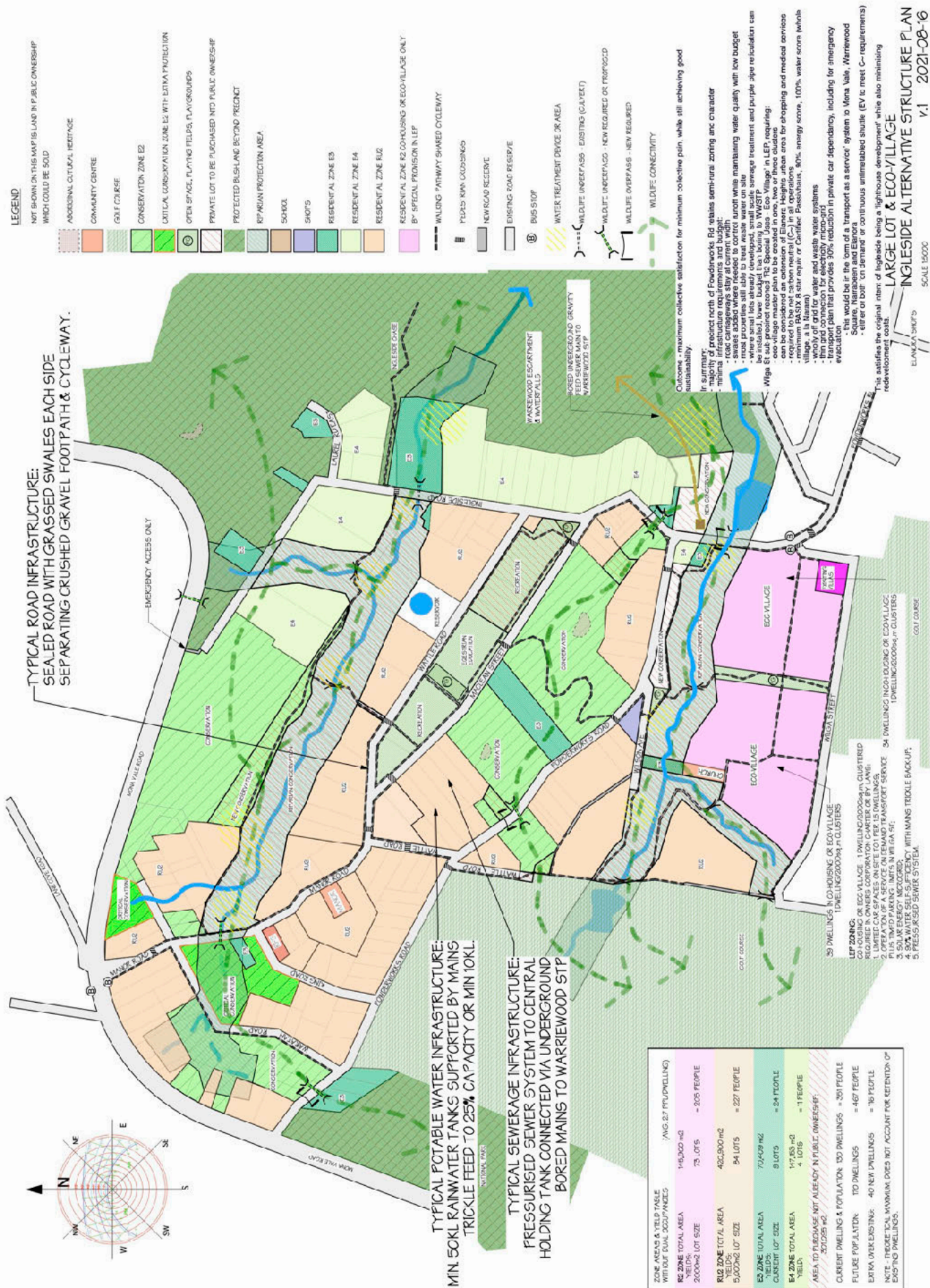
17. **Preferred development model: eco-village as part of masterplanned suburb**

We refer to our 2021 submission of alternative masterplan for the whole of south Ingleside, where Wilga-Wilson is a low-scale medium density eco-village. This would provide the opportunity to be carbon neutral for electricity, gas free, with recycled water for landscapes etc, and proper riparian zone regeneration.

It is possible to increase the density compared to that shown on the mapping below, without using multi-storey buildings.

Importantly, it would be ‘at scale’ and compliant with the current desired future character statements in both Ingleside and Elanora Heights DCPs.

Map - see next page...



PREFERRED WHOLE OF SOUTH INGLESIDE LAND USE MAP
SHOWING WILGA-WILSON AS AN ECO-VILLAGE
[© ENVIROTECTURE]