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08/10/2025

MR Milan Bubalo
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[REDACTED]

RE: PEX2025/0001 - 13 Wilga Street INGLESIDE NSW 2101

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To Whom It May Concern,

I am writing to formally object to the proposed residential development adjacent to the Serbian Orthodox Church of St Sava, located at 5 Wilson Avenue, Ingleside.

This submission reflects not only my concerns but also those of many members of our community and congregation who are deeply worried about the potential impacts of this development on the ongoing operation, safety, and future growth of our well-established community.

1. Privacy and Safety Concerns for Children

The proposed construction of three-storey residential buildings immediately adjacent to our property boundary raises significant privacy and safety concerns for the more than 160 children who regularly participate in our church's educational and cultural programs, including language instruction, scripture study, dance, and youth activities. It is essential that this environment remains a secure and private sanctuary, free from intrusive observation by neighboring residences.

2. Constraints on Future Development and Community Services

Since its establishment in 1949, our Church has been a cornerstone of the Northern Beaches community, serving one of the region's largest ethnic Christian populations. Our future plans include expanding facilities such as changerooms, classrooms, library and archival spaces, childcare and aged care facilities, as well as residential accommodations for clergy and care providers. The proposed development threatens these plans. To support these vital community services, it is critical that the Church's land be zoned R3 Medium Density Residential. Such rezoning will enable the Church to meet the evolving needs of its congregation and sustain its longstanding community role.

3. Protection of Operational Rights

Our Church hosts a wide range of cultural, religious, and educational activities fundamental to our identity and community service. These include Serbian language lessons, scripture

teaching, dance rehearsals and performances, and community events. It is imperative that any future development incorporate legal protections and title encumbrances to safeguard the continuation of these activities without interference or restriction from new residents.

4. Cultural and Historical Significance

The Serbian Orthodox Church of St Sava is not merely a place of worship but a vital cultural and spiritual home for many families who have been part of this community for generations. The Church's role in preserving language, faith, and tradition is invaluable and must be respected and preserved.

5. Ongoing Contribution to the Community

Since 1949, our Church has been a pivotal institution within the multicultural fabric of the Northern Beaches, consistently providing spiritual, cultural, educational, and social support to thousands of families. Any development that threatens the Church's operation also risks the broader community's cultural fabric.

6. Planning Proposal Concerns

The Planning Proposal seeks to amend the Pittwater Local Environment Plan 2014 (PLEP 2014) and introduce a new Development Control Plan (DCP) instead of using the existing Pittwater 21 DCP (P21 DCP). This response is therefore grounded in fundamental planning principles and current evidence rather than the standard PLEP 2014 and P21 DCP framework.

Although the Proposal falls within Ingleside's suburban boundary, our analysis references the Elanora Heights Locality Statement (Section D5 of the P21 DCP) due to natural community and infrastructure connections between the Wilga-Wilson precinct and Elanora Heights. Given the extensive impact on residents and businesses throughout Ingleside, Elanora Heights, and parts of North Narrabeen, we recommend expanding the notification area to include these communities to ensure all affected parties can respond.

7. Building Height and Character

The Ingleside Locality Statement emphasizes that new buildings should be subordinate to the natural landscape, generally not exceeding two storeys (approximately 8.5 meters). The Proposal includes five six-storey apartment buildings, clearly exceeding this height limit and contrary to the desired future character.

The Proposal also includes approximately 300 other house lots, which may have potential to comply with the locality statement if properly managed.

8. Traffic and Transport

Powderworks Road is a narrow, two-lane road that forms a vital connection between Mona Vale Road and Pittwater Road. Its widening is impractical due to prohibitive costs and the need for extensive property acquisition and reengineering. Without a fundamental change in transportation methods, Powderworks Road will remain a significant constraint on vehicle movement.

9. Bushfire Risk

The Proposal cites a Strategic Bushfire Hazard Study assessing the precinct's risk as "moderate" and compliant with Planning for Bushfire Protection 2019. However, the 2021-22 Rural Fire Service (RFS) report ranks the risk of fatalities as high. Additional analyses, including the 2018 Meridian Urban report and a submission by CR Bushfire, further highlight the precinct's high exposure to bushfire hazards and the increasing risks due to climate change.

While individual buildings may be constructed to meet bushfire protection standards, evacuation during emergencies poses a critical challenge. The 2021 refusal of a previous Ingleside development was based largely on concerns over the safe evacuation of residents via private vehicles along Powderworks and Mona Vale Roads-conditions that remain unchanged.

10. Bushfire Evacuation

Evacuation will rely heavily on private cars, and a mass evacuation is likely to cause severe congestion, jeopardizing safe egress. This was a key reason for the refusal of the previous subdivision proposal, and remains so today. For this reason alone, the current Proposal should be refused.

In conclusion, I urge Council to consider these concerns thoroughly and ensure that the proposed development does not undermine the privacy, safety, and future growth of our longstanding Serbian community institution and Future Development within the Ingleside Locality.

Thank you for your attention to this matter.

Yours sincerely,
Mr Milan Bubalo