

Liza Cordoba, Principal Officer Land Release
8am to 5:30pm, Mondays to Thursdays and 8am to 5pm Fridays

9 December 2011

Ms J Grant
Regional Director, Sydney East Region
Department of Planning & Infrastructure
GPO BOX 39
SYDNEY NSW 2001

Your Ref: 11/21160

Dear Ms Grant

RE: Pittwater Council Response to Department
Application for a Site Compatibility Certificate, Wilga Wilson Precinct
Ingleside

Thank you for the opportunity to comment on the application submitted by APP Corporation on behalf of the Wilga Wilson Residents Association. Council understands that the application is for a Site Compatibility Certificate lodged in accordance with Part 1A of *State Environmental Planning Policy (Housing for Seniors or Persons with a Disability) 2004*.

Council objects to a Site Compatibility Certificate being issued for the Wilga Wilson precinct for the following reasons:

1. The subject property has been part of the Ingleside Investigation Area since 1991, when Ingleside was first identified land release area under the Department's Metropolitan Development Program.

No change has been made to the area's boundaries.

All lands in the Ingleside Investigation Area must be considered holistically, with broad-scale planning being carried out across the entire area rather than ad-hoc, 'piece meal' site-specific planning and decision-making, committed to an orderly planning of a land release area and delivery of services and infrastructure is timed with new development.

2. A broad-scale approach towards infrastructure funding and delivery will assist in an overall funding regime of local and state infrastructure and services in the Ingleside Investigation Area that is equitable across Ingleside.

This will not occur if a Site Compatibility Certificate is issued for this precinct.

3. Council's Principal Engineer – Strategy, Investigation & Design has reviewed the accompanying Traffic and Transport Report prepared by Halcrow, and advised that the report does not adequately demonstrate how this is a compatible land use for the locality with regard to traffic and transport for the following reasons:
- Uses traffic generation rates that are too low, given the physical isolation of the site in respect to Pittwater and other parts of Sydney, the absence of effective public transport services to the site, the lack of constructed paths and/or accessible nature strips and the likely affluence of future residents of the development that will promote individual mobility using cars.
 - Does not demonstrate how the additional increased traffic in Powderworks Road above the environmental level of 10,000 vpd will be catered for and adverse impacts mitigated.
 - Does not address the future upgrading of Powderworks Road related to the future Ingleside Land Release to avoid possible future reconstruction of works provided now for the proposed development should Ingleside Land Release proceed.
 - Does not consider the impact of the traffic generated by the development on the intersections of Powderworks Road/Garden Street and Garden Street/Pittwater Road.
 - Does not provide evidence that an adequate public transport service would be available to the site.
 - Does not show that roundabouts in Powderworks Road could be constructed as proposed to serve as bus turning devices.
 - Does not consider the traffic impacts on Elanora Road which is the access road to Wakehurst Parkway from Powderworks Road.
 - Does not adequately consider the impact on the traffic signals at Mona Vale Road and Powderworks Road.
 - Incorrectly indicates that vehicular access to the site from Powderworks Road will be allowed at locations other than the Wilga Street/Wilson Avenue intersections, when this will not be permitted. All access must be via an internal road system.
 - Does not demonstrate how safe pedestrian access could be provided to existing bus services in Mona Vale Road.
4. This development is not required to meet Council's 2031 housing target, as reiterated in the *Pittwater Local Planning Strategy – Planning for Pittwater towards 2031*.

The 2031 housing target only applies to existing residential areas. This site, being in the Ingleside Investigation Area, has its own housing target allocation under the context of the Metropolitan Development Program.

5. Issuing a Site Compatibility Certificate for this site, is premature and has consequences for the future uptake of Ingleside as a release area particularly as the Site Compatibility Certificate is valid for 24 months from the date of issue.

A more detailed discussion of the reasons raised above is appended for your consideration.

Council is currently in discussions with the Department and other state agencies regarding the future of Ingleside, at the instigation of Council's resolution of 16 May 2011 and again on 15 August 2011 (as attached).

Council strongly urges that the Director-General not issue a Site Compatibility Certificate for this precinct particularly as it seriously undermines the progress towards a "whole of government approach" for a feasible planning solution being prepared by Council and NSW State Government.

This proposal is premature, the implications on the future traffic and transport in the locality not adequately addressed particularly with the future land release, and will sever opportunity to equitably collect infrastructure/services funding for this development that has long term implications for local and state infrastructure and services in the Ingleside Investigation Area.

I am available on 9970 1133 if you wish to discuss this matter.

Yours faithfully



Steve Evans

DIRECTOR, ENVIRONMENTAL PLANNING & COMMUNITY
Encl.

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Council strongly urges that the Director-General not issue a Site Compatibility Certificate for this precinct particularly as it seriously undermines the progress towards a "whole of government approach" for a feasible planning solution being prepared by Council and NSW State Government.

This proposal is premature, the implications on the future traffic and transport in the locality not adequately addressed particularly with the future land release, and will sever opportunity to equitably collect infrastructure/services funding for this development that has long term implications for local and state infrastructure and services in the Ingleside Investigation Area.

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Steve Evans
DIRECTOR, ENVIRONMENTAL PLANNING & COMMUNITY
Encl.

APPENDIX

Implications of excising Wilga Wilson Precinct from the Ingleside Investigation Area

Since 1991, the subject property (known as the Wilga Wilson Precinct) has been part of the Ingleside Investigation Area, an identified land release area under the Department's Metropolitan Development Program. Since that time, Council in conjunction with the Department has undertaken planning investigations in Ingleside.

I remind you of the series of meetings underway between Council and the Department's Strategies & Land Release officers, aimed at understanding the feasibility of rezoning and releasing this land based on a "whole of government approach" for Ingleside consistent with Council's resolutions of 16 May 2011 and 15 August 2011 regarding Ingleside (**Attached for your information**).

All lands in the Ingleside Investigation Area must be considered holistically, broad-scale planning carried out across the entire area rather than ad-hoc, 'piece meal' planning, ensuring that any new development in the area is delivered with appropriate level of services and infrastructure. Excising this precinct from the Ingleside Investigation Area has the following consequences:

- (a). Loss of the 27 hectares of land (site area of this precinct) from the Ingleside Investigation Area. These 27 hectares, with significantly less environmental constraints as compared to other lands in Ingleside¹, represents highly developable land within the release area.
- (b). Loss of 27 hectares of developable land in the Ingleside Investigation Area means loss of opportunity to levy for infrastructure and services commensurate with its development, being local and state infrastructure/services.

Broad-scale delivery of infrastructure would assist in overall funding regime of local and state infrastructure and services.

This will not occur if a Site Compatibility Certificate was issued at this time.

- (c). Creates a precedent for other lands in the Ingleside Investigation Area who sees this as an opportunity to be excised from the land release planning investigation, resulting in further reduction of total quantum of land for release.

This decision contravenes the orderly planning process already in place for the Ingleside Investigation Area, which had been clearly communicated to landowners in Ingleside and the wider community.

- (d). Council's 2031 housing target can be met in the existing residential areas of Pittwater. This precinct is not in Pittwater's existing residential area.

This development is not required by Council to meet its 2031 housing target.

Any future development of this precinct should be accounted for in the overall dwelling yield for Ingleside when it is released.

¹ As identified in Pittwater Council *Ingleside Investigation Area Preliminary Scoping Report*, Sept 2009.

Inadequacies with Halcrow's Traffic and Transport Report

By not using the highest traffic generation rates provided for in the RTA Guide to Traffic Generating Development for type of each land use in the development, the subsequent analysis of the local road system under estimates the impact on what is clearly a very stressed system due to existing traffic volumes.

The highest traffic generation rates should be used to recognise the physical isolation of the site in respect to Pittwater and other parts of Sydney, the absence of effective public transport services to the site, the lack of constructed paths and/or accessible nature strips and the likely affluence of future residents of the development that will promote individual mobility using cars.

Road Network Operation

The report does not demonstrate that the existing road system is able to cater for the proposed increase in traffic volume nor that the proposed infrastructure works are able to be provided.

Powderworks Road

- The report identified that the existing AADT is 10,700 vpd which is already in excess of the environmental capacity of sub arterial roads (10,000 vpd) adopted in Council's Warriewood Valley Roads Masterplan for two lane roads. The proposal will significantly increase traffic volumes but proposes no measures to ameliorate the impact.
- The report identifies that the Powderworks Road/Mona Vale Road intersection has "limited spare capacity" and concludes that the degree of saturation will not change with the additional traffic generated by the development, which appears to be inconsistent. Further, no consideration is given to the impact of the additional traffic on the operation of signals in respect to how this impacts traffic using Mona Vale Road, where extensive peak hour queuing currently occurs.
- The report fails to consider the impact on the operation of the Powderworks Road/Garden Street intersection through which traffic from the development will access Pittwater Road via Powderworks Road. This intersection is currently operating near capacity (recent investigation showed a degree of saturation of 0.96 where 1.0 is saturation) and will exceed its capacity in the near future with the predicted increase in traffic volumes generated by full development in Warriewood Valley. Any increase in traffic generated by the proposed development would not be acceptable without substantial upgrading of this intersection and the adjacent Pittwater Road/Garden Street intersection.
- The report proposes that there will be some vehicular accesses directly onto Powderworks Road other than via the intersection at Wilson Avenue and Wilga Street. This is not acceptable for new developments for reasons of traffic safety and capacity. It is a basic requirement of the Warriewood Valley Roads Management Plan that there are no vehicular accesses onto sub arterial roads (classification of Powderworks Road) and this must apply to any future new developments on Powderworks Road. Vehicular access to all properties must be via any internal road system and then to the Wilga Street/Wilson Avenue intersections with Powderworks.
- The report does not consider the future road structure of Powderworks Road to cater for the traffic to be generated by the proposed Ingleside land release so that the upgrade work that will be provided along the Powderworks Road frontage of the site does not have to be reconstructed in the future at the cost of the developers. Should a four lane road be needed instead of the existing two lane road, it may be necessary to widen the road reserve by requiring dedication of land along the Powderworks Road site frontage.

Elanora Road

- This road provides local traffic from Ingleside with access to the Wakehurst Parkway (main road) from Powderworks and would be used by future traffic generated by the proposed development.
- The report fails to consider the impact on this road which is steep and narrow with a poor intersection geometry at its intersection with Wakehurst Parkway. It is considered that significant upgrade works would be required for Elanora Road to safely cater for a potential increase in traffic volumes.

Proposed Roundabouts on Powderworks Road

- The report incorrectly states that the provision of "bus turning areas" can be incorporated into the design of the roundabouts proposed for the Wilga Street and Wilson Avenue intersections with Powderworks Road.
- By scaling of existing plans it is evident that it is not possible to design roundabouts at either location of sufficient diameter (AustRoads specify a minimum 15m radius for articulated or rigid buses not required to stop) to allow buses to turn without the need to resume private land that is not part of the development site.
- To ensure the safety and amenity of all traffic and road users (adequate width nature strips to be provided), it is not acceptable to simply allow Wilga Street and Wilson Avenue to intersect Powderworks Road at their current acute angle of approximately 30°. Both roads must approach the proposed roundabouts at an angle near 90° (as per existing intersection layouts) and there must not be any large deviation in the existing carriageway of Powderworks Road.
- The proposals are not acceptable as no assurances are possible that the necessary private properties can be purchased to allow the construction of roundabouts as proposed.

Access to Public Transport

- The report does not identify as to how the proposed development would have suitable access to existing public transport (buses) nor to future bus services, for which no evidence is provided that such new services will be provided with Sydney Buses or Forest Coaches.
- The report does not identify that the centre of the development is approximately 1.8km from the bus stops (greatly exceeds 400m recommended) in Mona Vale Road which provide access to a very limited cross regional service likely to be used by future residents and employees (likely that many staff members will live outside Pittwater due to economic factors). There are no constructed footpaths (nor pedestrian accessible nature strips) between the site and Mona Vale Road and these will not be available until such time as the Ingleside land release proceeds.
- The report does not identify that the centre of the development is approximately 1.1km (greater than the recommended 400m) from the nearest Sydney Buses bus stop in Powderworks Road where there is a limited service available to the city and local business centres. To travel beyond these destinations requires lengthy journeys and multiple changes at transport interchanges.
- The report does not identify that as portion of the site is over 400m from either proposed bus turning area on Powderworks Road it will be necessary for a public bus service to be provided within the site or along either Wilga Street or Wilson Avenue.

- The report provides no evidence that Sydney Buses will provide the suggested public bus service to the site and these discussions to date centre on using the proposed roundabouts as bus turning areas, which has been shown cannot be achieved. As an extension of the route into the site would require approval of the Department of Transport to fund Sydney Buses for the additional route miles, the provision of such a service is unlikely.

Agenda Report

C11.3 Status of Ingleside Investigation Area**Meeting:** Planning an Integrated Built Environment
Committee**Date:** 16 May 2011

COMMITTEE RECOMMENDATION

That the General Manager seek to have an urgent high level meeting with the Director General of the Department of Planning & Infrastructure and appropriate staff to urgently determine a forward path in developing a planning solution for South Ingleside, North Ingleside and Wirreanda Valley component of the original Ingleside -Warriewood land release.

(Cr James / Cr Rose)

Agenda Report

C11.5 Pittwater Local Planning Strategy

Meeting: Planning an Integrated Built Environment
Committee

Date: 15 August 2011

COMMITTEE RECOMMENDATION

1. That the report in relation to the outcomes of public exhibition of the draft *Pittwater Local Planning Strategy* (see **tabled document**) be noted.
2. That the revised *Pittwater Local Planning Strategy* and associated land capability map be adopted by Council.
3. That the *Pittwater Local Planning Strategy* and the recommendations contained therein be used as the basis for preparing a Standard Instrument LEP for Pittwater.
4. That following the meeting held between high level technical staff from Council and the Department of Planning and Infrastructure, a report be prepared for Council on the progression of a "whole of government approach" to the preparation of a planning solution for Ingleside.

(Cr James / Cr White)