

22 February 2017

Our Ref: 17-015

Department of Planning and Environment

Level 22, 320 Pitt Street
Sydney, NSW 2000

Dear Sir/Madam,

RE: DRAFT INGLESIDE LAND USE AND INFRASTRUCTURE STRATEGY - 165 MONA VALE ROAD, INGLESIDE

Thank you for the opportunity to comment on the *Draft Ingleside Land Use and Infrastructure Strategy*.

City Plan Strategy & Development Pty Ltd (CPSD) has been engaged by the owners of 165 Mona Vale Road, Ingleside (the subject site), to review the draft Strategy and supporting material and prepare a submission in relation to their property.

In summary, we support the general principles of the draft Strategy. However, it is our considered opinion that:

- (i) Further work is required to refine the proposed creek corridors across the Precinct, particularly in relation to Cicada Glen Creek to maximise the area of land available for housing on the site;
- (ii) Further work is required to refine the proposed land take for water management uses to maximise the area of the site for housing; and
- (iii) A clear timeframe and process for land acquisition should be made available to provide landowners with a greater degree of certainty.

We will elaborate on each of these points in this submission.

1. Site Description

The subject site (as illustrated below) is located at 165 Mona Vale Road, Ingleside, and is legally described as DP565232. The site has an approximate area of 17,720 sqm. The site is located in the centre of the Ingleside precinct and is situated to the immediate west of Mona Vale Road. The site is currently utilised by garden nurseries, with a large dam to the northwest which supplies water to the four agricultural businesses on the site. A detached dwelling set within a landscaped garden is located to the north of the site.



Figure 1: Aerial view of the subject site (Source: Sixmaps NSW).

The draft Strategy nominates the land at 165 Mona Vale Road for a mixture of land uses, as shown on Figure 2 below. The site is largely allocated for low rise apartment/townhouses and part of the site to the north is allocated for water management. A road is proposed to run through the site to the west and a creek corridor is proposed along the western extent of the site.



Applicable Land Uses

Low Rise Apartment/Townhouses	Parks	Heritage Curtilage
Water Management	Creek Corridor	Major Road

Figure 2: Applicable Land Uses (Source: draft Strategy)

2. Matters for Consideration

Further work to refine the proposed creek corridors

We understand that Eco Logical Australia was engaged to prepare the Riparian Corridors Assessment (RCA) to identify and assess the ecological values of riparian lands within the Ingleside Precinct. This assessment has informed the preparation of the draft Structure Plan for the site.

Cicada Glen Creek runs along the western extent of the site and is categorised in the RCA as "Reach T". The RCA states that all 20 stream reaches mapped within the Precinct are considered to meet the definition of a stream, however the RCA notes that the entirety of Reach T has been heavily modified by culverts, pipes, realignment and small dams/ponds. As such, the RCA defines Reach T as having a low conservation priority (as illustrated on Figure 3 below) and states that Reach T *"may be potentially suitable for removal from riparian corridor requirements under the Water Management Act if approved by DPI water"*.



Figure 3: Watercourse Conservation Priority (Source: RCA 2016)

Reach T forms part of the proposed creek corridor located along the western extent of the site. This impacts on the future development on the site. Given the initial assessment undertaken in the RCA and its categorisation as "low conservation priority", we request that additional work be undertaken to refine the extent of this creekline corridor in order to maximise the development opportunities on the site.

Further work to refine the water management uses

We understand that the proposed water management uses across the Precinct are indicative at this stage and further assessment will be undertaken based on detailed site surveys, detailed geotechnical and soil investigations when the final development plan for the sub-catchments is finalised. However we would like clarification on the total size proposed for the water management use on the site as well as the type of water management use proposed.

We believe there is scope to refine the water management use on the site at 165 Mona Vale Road and relocate the use further to the north of the site. We would be pleased to work with Council/ Department to ensure that appropriate refinement is made.

Timeframe for acquisition of land to be acquired by Northern Beaches Council

"Ingleside Precinct - Frequently Asked Questions (FAQ)" states that some areas in the Precinct zoned for environmental conservation, open space or water management uses will be acquired by Northern Beaches Council. The land will be acquired in accordance with the Land

Acquisition (Just Terms Compensation Act) 1991 and considerations such as the market value of the land, any special value of the land to the landowners and expenses as a result of relocating will be taken into account. The FAQ states that a land acquisition map will be prepared for the Ingleside Precinct, identifying land that will need to be acquired for a public purpose. This will be made available during the next round of consultation.

The site at 165 Mona Vale Road is partially effected by restrictions for "water management" and "parks" in addition to restrictions created by the works to Mona Vale Road. The current landowners are unclear of the intended timeframe for the acquisition of land. The FAQ states that *"the timing of any acquisition will be influenced by the rate of development"* however, this provides little certainty and clarity as to the timings when the land will be acquired.

We believe that triggers and a timeline should be put in place which clearly articulate when acquisition is likely to occur across the Precinct. This will provide the landowners at 165 Mona Vale Road with greater certainty and a clearer understanding of the timeframe so that informed decisions can be made regarding future potential development.

3. Conclusion

We appreciate this opportunity to contribute to the future planning of Ingleside.

If you require any further information or wish to provide any feedback regarding this submission, please free to contact Lotti Wilkinson on (02) 8270 3500 or lottiw@cityplan.com.au

Yours Sincerely,



Juliet Grant
Executive Director