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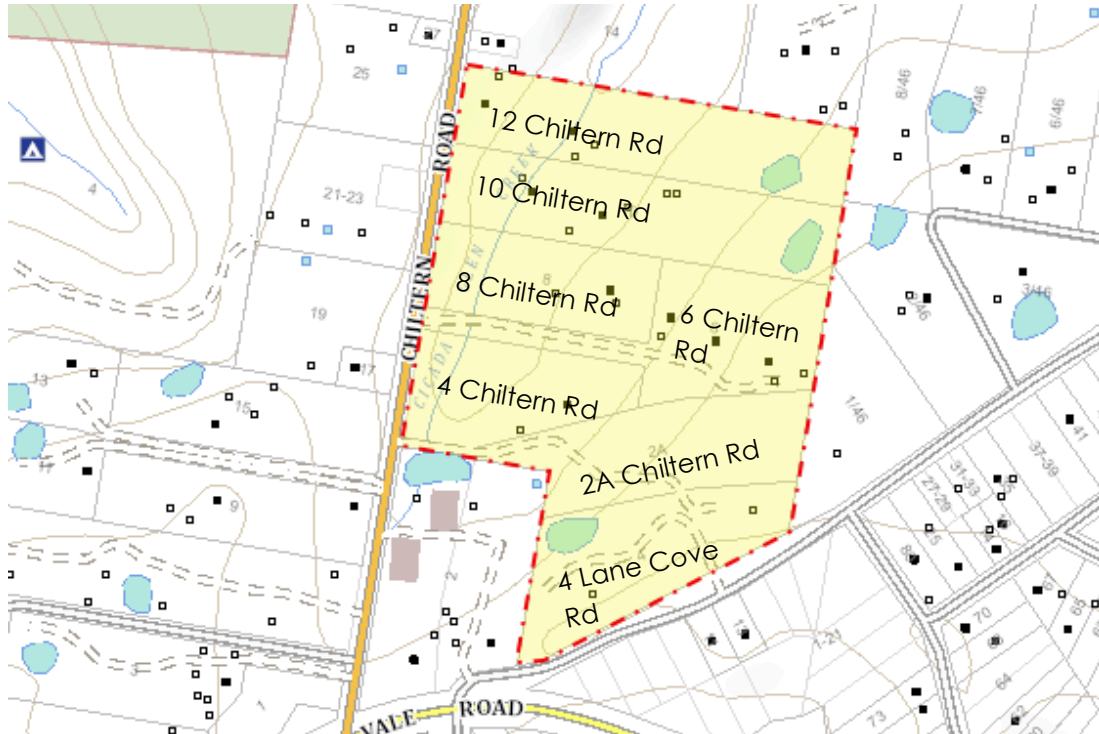
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

RE: Chiltern Road, Ingleside Landowners – Submission to Draft Ingleside Land Use and Infrastructure Strategy

This submission on the Draft Ingleside Land Use and Infrastructure Strategy (Draft Strategy) is made on behalf of a number of landowners in Chiltern Road, Ingleside.

The Landowners are generally supportive of the precinct planning process undertaken for the Ingleside Precinct, but consider their land may make a more significant contribution towards meeting Sydney's housing needs.

The subject site includes a number of existing rural residential dwellings with a total combined area of approximately 18.8 hectares. Refer to Figure 1 for the site location and boundary.



The draft North District Plan identifies A *Liveable City* as a priority for the District. The Plan has a 5-year housing target of an additional 3,400 dwellings by 2021. In addition, the Plan promotes housing diversity, especially affordable housing in proximity to centres, and identifies a target of 5-10% of new floor space for affordable housing. It is likely this affordable housing policy will apply to Ingleside once rezoned.

The vision for the Ingleside Precinct is to create a sustainable development that meets the needs of a well-connected and diverse community, supported by local facilities and infrastructure.

It is considered that the subject site could be developed for higher densities than indicated in the draft Structure Plan, consistent with the priorities for A *Liveable City* and in line with principles to preserve the visual landscape of Ingleside. This would include making additional contributions to the District's housing targets, and improving housing choice, diversity and affordability.

The following discussion outlines the areas in which the draft Structure Plan and supporting documentation could be reconsidered.

Key outcomes for the site (as per the draft Structure Plan)

The key outcomes of the site are shown in Figure 2 below and are as follows:

- The proposed maximum height of buildings is 10.5m (3 storeys) for the majority of the site where low rise apartments/townhouses are planned;
- The proposed density for low rise apartments/townhouses is 25 to 27 dwellings per hectare (approximately 300m² on average);
- Low density residential land uses are proposed for 12 Chiltern Road at the north of the site;
- The Cicada Glen Creek is proposed to the west of Chiltern Road, surrounding this creek is a proposed Environmental Management area and an ecological corridor traverses a portion of the site in the west. Water Management areas have been proposed adjacent to the creek corridor;
- A network of roads are proposed through the site with one major road between 2A Chiltern Road and 4 Lane Cove Road in the south of the site; and
- The site is located adjacent to the future Neighbourhood Centre to the south west of the site.



Figure 2 Structure Plan - Site location

Source: Department of Planning and Environment, Pittwater Council and Urban Growth modified by Mecone

Visual landscape assessment

The Draft Visual Landscape Assessment (Richard Lamb and Associates) concludes that the Chiltern Road area comprises some of the least visually sensitive lands within the Ingleside Precinct. The draft Visual Report identifies the lands (within 'Area 2') provide an opportunity for higher density development. The subject site is not significantly constrained by high external visibility or landscapes that are visually unique.

The Structure Plan's response has been to locate the neighbourhood centre in this area, fringed by town houses and low-rise apartments around Chiltern Road. This has been broadly translated into a maximum height control of 10.5 and 11m over the area, though there is little evidence in the exhibited planning package to suggest that buildings above 10.5/11m would significantly impact the visual landscape in the Precinct. The visual assessment does not include a modelling analysis of various building height planes across the site, nor does it make an assessment of a variety of

different building forms to support the assertion that the built form guidelines are based on the outcomes of the Visual Landscape Assessment.

It is suggested that higher buildings and greater densities may be desirable in certain locations, such as close to the centre and along Chiltern Road, where the local topography would serve to minimise visual impacts. It is recommended a higher and denser built form be considered in the more accessible locations where the visual landscape permits, and that this should be tested with the local community through an exhibition process.

Built form outcomes

The built form guidelines contained in the exhibition package aim to deliver “...a range of housing types and choices...” (p23 of the Draft Strategy). However, the exhibition package does not go far enough to prove the draft Structure Plan and associated built form guidelines will lead to a range and diversity of housing types. While it is acknowledged that the proposed draft Development Control Plan will likely contain urban design principles, it is difficult to see from the exhibited documents whether detailed urban design analysis has been clearly linked to the draft Structure Plan outcomes.

It is suggested more analysis be undertaken on the potential built form to ensure the Ingleside Precinct and local residents benefit from the full range of housing. This should include testing of different built forms, sketches and imagery of potential development outcomes. Without this detail, it is difficult to see whether the full range of issues have been explored. The package does not provide a clear view of what the area may look like in the future.

The restrictive 10.5 and 11m height limit leaves no flexibility for innovation in building and architectural design. The proposed controls will do nothing for architectural variance and diversity in bulk and scale. It is predicted the current controls will lead to uniformity in building form within each of the various density bands, which may lead to a poor urban design outcome for Ingleside. The economics of development are such that developers will have no choice but to build up to the prescribed height controls.

It would be better to encourage innovation through more flexible building heights and density controls, and/or to facilitate a transition in heights with distance from the centre. Encouraging denser development within the centre and surrounds would also support the centre's viability and will ensure the retail uses are successful and the centre grows into a vibrant node.

It is recommended higher buildings be permitted within the local centre (e.g. 20m) and in locations within walking distance of the centre and public transport. The subject site should be considered for a higher and denser built form, particularly within an easy walk of the station (i.e. 400m). For example, five and six storey apartment buildings close to the centre would be appropriate and would increase housing diversity and affordability considerably.

Development feasibility

It is unclear whether the proposed built form outcomes have been informed by analysis of development feasibility. The exhibition package also lacks detail on the potential infrastructure contributions framework (though it is acknowledged this information is forthcoming), which makes it difficult to connect the viability of development with the proposed planning framework, particularly when the density and height is so stringently controlled.

Given the high cost of land in Ingleside, it is questionable whether the proposed controls will provide sufficient incentive to develop the land at the densities prescribed, particularly when considering local and special infrastructure contributions will be enforced.

Demand for smaller housing

Ingleside Precinct is an excellent opportunity to accelerate housing supply in the North District. It is considered that the introduction of some high-density residential housing (i.e. High Density Residential zone) would support the ongoing viability of the Precinct's development and the required infrastructure and services.

Demand for smaller, more affordable housing is likely to increase due to empty nesters downsizing, in addition to first homebuyers and key workers looking for more affordable housing. This is supported by the trend for subdivisions down to 225m² in some local government areas across Sydney, as stakeholders work to introduce more diverse and affordable housing types on smaller lots.

The subject site is located in the centre of the Ingleside Precinct, adjacent to the proposed centre and in a walkable catchment to public transport. It is suggested a component of high density residential land uses be introduced close to the centre, transitioning to more traditional medium density forms of housing at the edge of the subject site.

Views and vistas

The Landscape and Visual Assessment focuses on protecting the views of those looking over Ingleside, however, little thought has been given to improving the amenity of future residents by allowing higher buildings to take advantage of the topography and views east to the Pacific Ocean. Given the topography, it is likely increased building heights could be implemented with negligible impacts on overshadowing.

The benefit of contiguous landholdings

The subject site is a large contiguous landholding that could be amalgamated and developed in one line. The landowners have shown they are willing to work together to offer the land for redevelopment, which would overcome the time and complexity difficulties often encountered with land in fragmented ownership. This also offers the opportunity for improved urban design outcomes compared to piecemeal development.

Extending the medium density area (to 12 Chiltern Road)

Number 12 Chiltern Road is located approximately 300m from major roads and the proposed centre, both of which are considered to be within a walkable catchment (i.e. 400m). Rezoning of 12 Chiltern Road for higher density residential land uses will enable a sustainable, cohesive, integrated development with the lots adjacent to the south.

Rationalisation of the Cicada Glen Creek corridor

DPI Water's Guidelines for riparian corridors on waterfront land specify a 10m Vegetated Riparian Zone (VRZ) be provided from top of bank to first order watercourses (i.e. total VRZ 20m plus channel width) although the draft Structure Plan indicates approximately 70-100m of riparian extents in the vicinity of the subject site. It is requested the true top of bank is accurately surveyed and pegged to assist in confirming the VRZ extents.

There is some inconsistency in the zoning of land surrounding the Cicada Glen Creek corridor. The centre is directly adjacent the creek corridor with no riparian buffer. On the western side of the creek at 12, 14 and 16 Chiltern Road and further north of Cicada Glen Road, the proposed roads act as a buffer to the creek, yet on the eastern side of the road there is land proposed for Environmental Management as well as a road providing a much larger buffer.

Further clarification is sought as to the methodology in this instance. It is suggested that roads proposed to the east of the creek, adjacent to 8, 10 and 12 Chiltern Road, be located adjacent to the creek corridor to increase the developable area available. We request that the area proposed for Environmental Management adjacent to 4 Chiltern Road be reduced consistent with other areas where there is no buffer surrounding the creek corridor.

Water cycle management

The Water Cycle Management and Flooding Assessment conducted by Cardno for the Precinct Planning recommends two on-line basins (OSD_C3 and OSD_C6) within the site. On-line basin (OSD_C6) is located further north of the site and on-line basin (OSD_C3) is located to the west of 2A Lane Cove Road and 4 Chiltern Road.

Cardno recommended only two on-line basins for the site and did not recommend the third on-line basin adjacent to 10 Chiltern Road. However, the Structure Plan includes an additional Water Management area located on the western boundary of 10 Chiltern Road. We request that the Water Management area at 10 Chiltern Road be removed consistent with the report prepared by Cardno.

Promoting housing diversity

One of the objectives of the Draft Strategy is to "create a diverse housing mix that caters to a range of household types". The highly restrictive controls proposed as part of the Structure Plan will limit the mix of housing, which will in turn limit the ability of key workers to purchase housing in this Precinct. Due to the expected increase in key workers associated with the Northern Beaches Hospital Precinct it is likely that

demand for affordable housing will increase in Ingleside. Further consideration should be given to increasing the density of the site to provide a diverse housing mix to cater to a range of household types. This will also assist in meeting the targets set in the district Plan relating to affordable housing.

Conclusion

The exhibition of the draft Structure Plan for Ingleside is a positive step forward for the Ingleside Release Area and the precinct planning process is fully supported by the individual landowners. The landowners along Chiltern Road believe their land offers an excellent opportunity to promote a diversity of housing types and increase the supply of desperately needed housing on the Northern Beaches.

It is suggested a higher and denser built form may be explored for this site and land within the proposed centre and surrounds. This would be in keeping with the Government's direction to increase housing supply and diversity, and lower the cost of housing, while promoting livable environments.

We thank you for the opportunity to provide a submission and look forward to reviewing more detailed information when publicised later this year.

Please contact Lee McCourt on 02 8667 8668 should you wish to discuss this submission in more detail. Alternatively, we would be happy to attend a meeting alongside the landowners to discuss the potential of the site further.

Yours sincerely



Lee Mulvey

Director