



Department of Primary Industries

OUT17/9334
(SECI16/498)

NSW Department of Planning and Environment
Land Release
GPO Box 39, Sydney NSW 2001

Dear Sir/Madam

The Ingleside Precinct Draft Land Use and Infrastructure Strategy

I refer to your letter of 12 December 2016 to the NSW Department of Industry, Skills and Regional Development (Department of Industry) in respect to the above matter. Comment has been sought from the relevant divisions of the Department. This is a response from the NSW Department of Primary Industries, with the Department of Industry – Lands being the only other division within the Department to provide comment at this stage. The Department of Industry would appreciate the opportunity to comment on any future rezoning proposals or development applications (DA) for the precinct.

Department of Industry - Lands advises that the Ingleside proposal encompasses considerable parcels of Crown land (of varying tenure) which have been referred to the Department of Industry – Lands' sales team to examine any commercial sales or development opportunities.

Department of Primary Industries (DPI) advises that recommendations and comments for water, fisheries, agricultural and Cemeteries and Crematoria NSW have been provided at **Attachments A, B, C and D** respectively. In summary, the key issues identified in these include:

- **DPI Water** – Demand and supply of water for new subdivisions requires consideration of both potable and non-potable requirements. DPI Water's preference is for all new developments to be serviced by reticulated water supply. In areas where this is not feasible, DPI Water recommends appropriate studies are undertaken for areas identified for future development to ensure the required volumes of water can be supplied long term and in times of varied climate, without placing pressure on groundwater resources.

DPI Water recommends further consideration of this issue, as well as other water-related issues listed in Attachment A, such as impacts of the development on surface water and groundwater and the management of stormwater and effluent disposal systems. It is expected that any future development application (DAs) for the site should include adequate information on these issues.

- **DPI Fisheries** – It is recommended that as part of the DA process, there be consideration of the implementation of control measures to guide the management of the Riparian Protection Areas. Additionally, it is recommended that a Riparian Corridor Management Plan be developed and implemented in accordance with the recommendations outlined in the Ingleside Riparian Corridor Assessment. Development impacts should be offset by incorporating new wetlands into the precinct where possible, as recommended by the Ingleside Riparian Corridor Assessment. Waterways should be remediated to reverse the effects of erosion and restore them to a healthy natural state.

Other recommended development controls are contained in Attachment B.

- **DPI Agriculture** – Any land use conflict potential should be identified and assessed at the rezoning and DA stages. Specifically, any proposal for residential development near existing agricultural uses should assess the potential for land use conflict.
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As the proposal progresses, care should be taken to ensure effective consultation with existing agricultural businesses on potential changes to land use in the precinct.

- **Cemeteries and Crematoria NSW (CCNSW)** - The draft North District Plan (Greater Sydney Commission, November 2016) contains the liveability priority "support planning for cemeteries and crematoria - relevant planning authorities should give consideration to the need and locational requirements of cemeteries and crematoria. How these matters have been taken into account needs to be demonstrated in any relevant planning proposal." There is insufficient cemetery space for the northern district of metropolitan Sydney. CCNSW urges recommends the Department of Planning and Environment consider these matters in further refining plans for this Precinct.

Yours sincerely



Mitchell Isaacs
Director, Planning Policy & Assessment Advice
28 February 2017

DPI appreciates your help to improve our advice to you. Please complete this three minute survey about the advice we have provided to you, here:

<https://goo.gl/o8TXW>

Attachment A

The Ingleside Precinct Draft Land Use and Infrastructure Strategy Specific comments – DPI Water

1. Recommendations

Water Supply

The Ingleside Precinct Water Cycle Management and Flooding Assessment outlines potable water will most likely be supplied by a new centralised piped network due to the lack of current infrastructure. DPI Water considers access to a sustainable water supply is a key factor in determining suitable locations for future development and an issue which should be given careful consideration to.

The water demands for new subdivisions, requires consideration of both potable and non-potable requirements. DPI Water's preference is for all new developments to be serviced by reticulated water supply. In areas where this is not feasible, DPI Water recommends appropriate studies are undertaken for areas identified for future development to ensure the required volumes of water can be supplied long term and in times of varied climate, without placing pressure on groundwater resources.

Effluent Management

The draft strategy outlines an On-site Effluent Subdivision Assessment was undertaken to determine the capacity and constraints associated with on-site treatment of effluent. It is understood the assessment found a number of significant constraints to subdivision in these areas, including slope limitations and soil depths. Whilst a definite effluent management system has not been decided on at this stage, there may be options for alternate or centralised solutions.

DPI Water notes potential for contamination impacts on groundwater if onsite sewerage disposal systems are used. DPI Water expects further information would be provided at the rezoning or development application stage however consideration should be given to the potential increase of effluent disposal systems as a result of additional dwellings. The Environment and Health Protection Guideline: On-site Sewage Management for Single Households (1998) recommends appropriate buffer widths between potential contamination sources and water supply sources.

DPI Water also advises of buffer requirements outlined in the relevant water sharing plan between groundwater bores and onsite sewerage disposal systems. In particular, the lot sizes proposed may not be able to meet this requirement. It is recommended consideration is given to an appropriate lot size to meet this requirement.

2. Gaps in the project detail

Watercourse Management

An assessment of the riparian lands and biodiversity values within the Ingleside Precinct has been undertaken. The Ingleside Precinct has a number of first and second order watercourses traversing the site. The draft Biodiversity Assessment Report recommended the provision of vegetation buffers along the conservation areas to retain wildlife corridors and to protect conservation areas. The riparian corridors will be contained within the wildlife corridors. DPI Water supports the provision of adequate buffers in accordance with the Department for Primary Industries – Water's Guidelines for Controlled Activities.

DPI Water notes the technical assessments supporting Ingleside Precinct acknowledge the requirement for works to be in accordance with the Guidelines for Controlled Activities and the Guidelines have been considered during the development of the Structure Plan.

The supporting documents do not outline in detail the type of works proposed for the watercourse but it is expected this information will be outlined in detail during the development application process.

Future Rezoning/ Development Applications

DPI Water understands the structure plan for the Ingleside Precinct is at a larger scale than individual development applications and is aware some issues would be discussed in greater detail either during the rezoning process or the development application stage.

However, it is expected any future development applications for the site should include information on the following issues:

- Impacts of the development on surface water and groundwater;
- Impacts on any watercourses/ wetlands on or adjacent to the site;
- Management of stormwater;
- Consideration and provision of adequate setbacks or buffers to sensitive areas such as watercourse, wetlands;
- Acid Sulfate Soil Assessment;
- Provision of infrastructure and services;
- Consideration of potential off-site impacts;
- Consideration of all relevant guidelines.

End Attachment A

Attachment B

The Ingleside Precinct Draft Land Use and Infrastructure Strategy Specific comments – DPI Fisheries

- Riparian Protection Areas

Section 3.8.5 of the Strategy states that 'Riparian Protection Areas' are identified in the Structure Plan; the Structure Plan only identifies 'creek corridors'. It is assumed that these are referring to the same thing. However, the name 'Riparian Protection Area' seems to indicate a level of conservation, whereas 'creek corridor' does not. It is recommended that 'creek corridors' are updated in the Structure Plan as 'Riparian Protection Areas'.

DPI recommends that as part of the development application process, there be consideration of the implementation of control measures to guide the management of the Riparian Protection Areas. Waterways and riparian buffers should be enhanced as a result of the precinct development. Controls should include litter removal, weed removal and planting of native riparian species prior to the development in the precinct. This will mitigate against sediment runoff during and post construction and improve water quality.

DPI recommends that a Riparian Corridor Management Plan be developed and implemented in accordance with the recommendations outlined in the Ingleside Riparian Corridor Assessment. Waterways should be remediated to reverse the effects of erosion and restore them to a healthy natural state.

Development impacts should be offset by incorporating new wetlands into the precinct where possible, as recommended by the Ingleside Riparian Corridor Assessment. It is recommended that this is incorporated in the Strategy.

- Other Development Control Measures

The few remaining *Posidonia* seagrass beds in Pittwater local government area are endangered and under threat from suspended sediment loads and poor water quality flowing from the creeks within the development precinct. Water sensitive urban design elements must be included in the development controls to reduce stormwater runoff and improve water quality in these tributaries of Pittwater.

The water management controls outlined in Section 3.9 of the Strategy are positive, but require more detailed description and specifications in the forthcoming Development Control Plan.

End Attachment B

Attachment C

The Ingleside Precinct Draft Land Use and Infrastructure Strategy Specific comments – DPI Agriculture

- Land use conflict - Any land use conflict potential be identified and assessed at the development application stage. Specifically, any proposal for residential development near existing agricultural uses should assess the potential for land use conflict. If required, appropriate mitigation actions such as setbacks / vegetative screening should be considered in the planning process.
- Where land is proposed to remain for rural type pursuits such as horse establishments or plant agriculture the precinct design should maximise setbacks / buffers between these activities and higher density dwelling areas.

The DPI's Land Use Conflict Risk Assessment Guideline can be used to assess potential for urban / rural boundary issues, and can be found at:

http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0018/412551/Land-use-conflict-risk-assessment-LUCRA-guide.pdf

End Attachment C

Attachment D

The Ingleside Precinct Draft Land Use and Infrastructure Strategy Background information – Cemeteries and Crematoria NSW (CCNSW)

The increased size and age of the populations in the north planning district of metropolitan Sydney will increase the demand for adequate provision for burial and cremation services. CCNSW is currently completing work on a cemetery capacity survey for the most populated regions of NSW, expected to be published in April 2017. The best available data predicts that all cemetery space in the Sydney metropolitan region will be exhausted by 2050. Exhaustion of capacity is likely to occur sooner in some areas and for some communities, including the north planning district.

Cemetery capacity in the north district is projected to be exhausted altogether by around 2033, with "at need" burial capacity (ie, access to grave plots for persons who have not pre-purchased, but seek a grave at the time of a relative's death) projected to be exhausted well prior to 2033. The major cemetery facilities in the north planning district, at North Ryde, were each established over seventy years ago, and have limited burial land remaining.

The need for additional cemetery capacity in the north district is urgent, and there are very few developments in the region of the scale of this development, with opportunity to make provision for local and regional cemetery requirements. There is opportunity in the Ingleside Precinct Plan to make a reasonable area of land available for cemetery land use.

CCNSW recommends that consistent with the draft North District Plan, the Department of Planning and Environment consider the demonstrated requirement for local and regional cemetery capacity for the North planning district, in progressing plans for this Precinct. CCNSW is able to provide additional information on projected regional requirements, and on the positive potential for co-location of cemetery and other open space land uses, as required.

End Attachment D
