



REPORT TO THE MINISTER OF PLANNING

WARRIEWOOD VALLEY REDEVELOPMENT
MP O9 _ 0162

PREPARED BY CLIMATE ACTION PITTWATER

MERITON WARRIEWOOD MP 09_0162

Climate Action Pittwater has reviewed the above submission and we submit our comments and concerns for consideration by the Minister for Planning.

The development of this site provides an opportunity to create a sustainable precinct which is more than just built form. It requires the support of a mixed use sustainable community appreciative of a development that is truly sustainable by also addressing energy efficiency, transport, food buying and waste disposal.

The Green Building Council of Australia Greenstar Communities is in draft form but it provides a framework for establishing sustainable communities:

** A sustainable community has aspirations for the future that acknowledge the challenges brought about by change. It is liveable, resilient and adaptable. It strives for a lower carbon and ecological footprint. It has environments designed for all*.*

The design should work on a number of levels including:

- solving problems of heating and cooling, energy supply, water usage
- provision of services to help people make sustainable choices such as walking rather than driving
- enabling the community to create their own facilities and groups to improve quality of life and reduce their environmental impact.

This development in it's current form has many shortcomings with regards to establishing a sustainable community including:

- site density is too high. Pittwater Council has allowed 140 units for the site
- infrastructure will not sustain the increased traffic
Traffic report *the nominal maximum traffic volumes based on their heirachical classification would be exceeded on Garden St., MacPherson St., Ponderosa St., Jubilee Ave., Warriewood Road*.
- solar access to 70% of the units as they are south facing is not achievable
- outdoor communal area, the Central Park, will not provide desirable amenity as are overshadowed by the 5 storeyed blocks
- views to the wetlands and associated planting are blocked by 5 storeyed elements
- internal roads at ground level take away landscaping opportunities
- The ESD report prepared by Cundalls outlines many ways to achieving a sustainable development but there are no commitments going beyond Basix. We ask that, if the project is approved, there be a mandatory commitment to becoming a Green Star Communities Project which will:
 - become self sufficient in power by providing a pico or tri generation and/or photovoltaics to provide electricity
 - consider embodied energy of materials, transportation kilometres to the site, selecting recycled and sustainable materials, low VOC adhesives, materials and finishes
- Encourage a sense of community interaction by providing community gardens at ground level and at roof level. These can be shaded by PV panels.
- EA report:
 - does not explain why the building height increases above 8.5metres can be justified

- does not explain how transport issues will be addressed - bus services already at capacity, traffic movements during peak hours will exceed the limits

Review of the Environmental Assessment:

RE: ITEM 4 Director General's Requirements

non conformance with:

- Built form – exceeds 8.5m limit of Pittwater Council high, too bulky – southern wall of 5-storyed buildings restricts views to wetlands and associated green areas
- ESD – the report describes what to do to achieve desirable outcomes in this regard but falls short of ensuring that there are commitments to build *green* or sustainably
- contributions – the developer seeks to pay a lesser amount with no real justification
- utilities – *address existing capacity and requirements...* - Energy Australia have been telling us that they have problems keeping up with power demands in this area. Why do Meriton say that they have no problems. Where is the proof?

RE: ITEM 1.6 Consultation – concerns of locals raised:

- The number of dwellings proposed for the site, and compliance with Local planning controls (LEP and DCP) **not satisfied**
- Why the DOP Part 3A process will be used to determine the proposal as opposed to Pittwater Council
- The height of the proposed development and its impact on the existing character of the area. **Exceeds height limit**
- Potential impacts on local traffic conditions, including access to Mona Vale Road and public transport. **Car movements in peak hours will exceed limits**
- How the proposed development will impact on local services including Mona Vale Hospital, Warriewood Shopping Centre, public transport and local schools. **Not addressed**
- Potential impacts on Warriewood Wetlands and how they will be mitigated. **Not addressed**
- How parking on site will be accommodated. **Underground parking mentioned but is it for all units? Is parking provided at ground level? If so can it be accommodated so that more green open space can be provided? Or provide a car share arrangement (refer to BedZed in London. Barangaroo are considering this also)**
- Compatibility of residential development with the neighboring Sewage Treatment Plant and
- Questions about the links between the proposed development for the local economy. **Not addressed adequately**
- The issues identified above are not in order of significance and represent a summary of the key issues identified in community consultation conducted to date. Responses to these issues are provided throughout this report with the focus of responses provided in the Environmental Assessment at Section 6.
- The consultation undertaken by the Proponent has adequately addressed the Director General's Requirements for Consultation. That said, consultation activities will continue in addition to the

statutory exhibition period. But the locals concerns have not adequately been addressed as we will show going through the report

RE: ITEM 2.2 Surrounding Area

– site adjoins Warriewood wetlands 260 hectares. Impact of wall of 5- storeyed buildings will be detrimental to that treasured amenity. There will be overshadowing issues

The Statement that ,600 dwellings provides an opportunity that will help Pittwater LGA meet its dwelling targets as stipulated in the Metropolitan Strategy' is misleading. Pittwater Council have informed us that they can meet their obligations without a development of this size and this will be addressed in the submission from Pittwater Council.

RE: ITEM 2.5 Access, traffic and Transport

The traffic report Appendix E states , The nominal maximum traffic volumes based on their hierarchical classification would be exceeded on Garden Street, MacPherson Road, Ponderosa Street, Jubilee Avenue and Warriewood Road"

RE: ITEM 2.8 Constraints and Opportunities

Constraints

Re: 50m Public Riparian Zone:

Impact of wall of 5-storeyed buildings will overshadow the new riparian zone which is to be used as a multi use open space corridor

Opportunities:

Re: site topography:

Views to surrounding wetlands will only be seen from south facing units in the 5-storey blocks

Re: large portion of land:

The proposed development will not integrate or be complimentary to the existing community. It will set a precedence for this type of development which is contrary to the vision of the Warriewood Masterplan.

RE: ITEM 4.5 ESD

Integration Principle:

Report states that the integration principle, social, environmental and economic factors have informed the design and development of the proposal. – what about a truly mixed use development – a ,village' which contains a mix of commercial, select manufacutring with the medium density housing?

You cannot assure that principles have been inbedded unless projects are rated – that means each building and the project as a whole – otherwise it's greenwash. There has to be third party certification to prove that it has been done seriously.

Building sustainability:

What about going beyond BASIX? This a minimum standard

Get a commitment to becoming a Green Star project under the Mulit Unit Residential Rating.

The Redfern Housing Redevelopment „sets a new standard for social housing developments and demonstrates that environmentlly, economically and socially sustainable outcomes are achievable“ It was awarded a 5 star- Green Star rating under the Multi Unit Residentail Pilot in 2009. Here is the link to this project:

<http://www.gbca.org.au/green-star/green-building-case-studies/redfern-housing-redevelopment/2905.htm>

While there have been eco-residential and eco-industrial developments in the past, none, to our knowledge have incorporated such a wide range of uses as Dockside Green in Vancouver, Canada.

A model for holistic, closed-loop design, Dockside Green will function as a total environmental system in which form, structure, materials, mechanical and electrical systems will be interrelated and interdependent - a largely self-sufficient, sustainable community where waste from one area will provide fuel for another. Here you will find a dynamic environment where residents, employees, neighboring businesses and the broader community will interact in a healthy and safe environment, reclaimed from disuse and contamination.

As a LEED® Platinum targeted project, Dockside Green's principles of New Urbanism, smart growth, green building and sustainable community design are all essential elements of our development plan.

Read about our sustainability features in our 2008 Annual Sustainability Report or review a summary of Dockside Green's Environmental Features.

Below is the link to the promotional video:

<http://docksidegreen.com/living/overview/overview.html>

and the link to the Project sustainability overview document:

<http://docksidegreen.com/images/stories/sustainability/overview/greeninitiatives.pdf>

RE: ITEM 4.6 Urban design and planning principles

Refer to Page. 32:

Create the opportunity for views to parks, vegetation and wetlands elements from the public domain. **Restricted by wall of 5-storeyed buildings**

To create a level of visual interest and variation between the natural and built environment, the road network and building layout, road network and building layout has been designed to optimise views through the site and beyond to the wetland area. **Restricted by wall of 5-storeyed buildings** The location of the residential buildings also

results in casual surveillance to these areas, creating a safe and visually interesting environment.

Create a high quality public domain

The proposal seeks to create a high quality public domain of well landscaped streetscapes and open space. Public open space adjacent to the wetland area will accommodate a range of passive and active recreational opportunities. **Overshadowed by 5-storeyed buildings**

Internal roads

An internal road network is proposed for the subject site. The proposed local street will be constructed and dedicated to Council. **Delete and access through basement. More landscaping area opened up.**

RE: ITEM 4.9 Density

Increased density will result in increased number of people still commuting out of the area for work – more car movements. More buses will be needed when services are continually being cut. What assurances have been given that Sydney buses will increase the number of bus services to the area and when?

Refer to Page 36:

• The proposed development is thus expected to generate around 327 vehicle trips per hour during the weekday morning peak hour and 323 vehicle trips per hour during the evening weekday peak hour. The proposal will not significantly increase traffic on roads within Warriewood Valley. • With the already planned infrastructure Upgrades in Warriewood Valley, the key intersections are expected to operate at satisfactory levels of service with the additional traffic generated by the proposed development. Without the upgrades the traffic movements exceed limits. When will upgrades be carried out?

Refer to Page 36:

• The proposal responds to the density and character of surrounding development by maintaining a height limit of 3 storeys to each of the external street frontages in response to the 3 storey aged housing development to the north. Five (5) storey buildings are located to the middle and rear of the site adjacent the open space corridor.

5 storeys is out of character in the area.

Located to the rear it creates problems of overshadowing and bulk over the riparian + buffer zones which, as stated previously, are to be considered as recreational open space

RE: ITEM 4.12 Building materials and finishes

Refer to Page 37:

The proposed materials and finishes for the Stage 1 Project Application are illustrated on the elevation drawings included at Appendix A and the accompanying materials and finishes sample boards. A simple and refined palette of materials and colours is proposed that will provide visual interest and façade articulation to effectively articulate each of the building facades.

The selection of materials and finishes is generally consistent with the range of contemporary materials being used in other recent developments in Pittwater.

Have the materials selections been made with consideration to sustainability ie: durability, emissions (greenhouse and ozone impacting gases), low embodied energy, recyclability at end of life, fsc timber, low VOC's, recycled contents in plasterboard, concrete ???

Materials can be rated under Ecospecifier, Good Environmental Choice etc. Again unless materials used have a third party stamp – it's just greenwash.

RE: ITEM 5.12 SEPP65 Residential Flat Design Code 2002

Compliance table:

Site Analysis – proposed development containing 4 5-storey blocks does not respond to the surrounding existing and future character. Pittwater Council submission addresses this issue.

Landscape Design and Open Space – central landscaped open space, 'Central Park' will be overshadowed by 5 storeyed buildings. It will be surrounded by intimidating 5-storeyed buildings with overlooking issues. The views to the wetlands beyond will be cut off by 5-storeyed buildings. All in all not a comfortable space to enhance community engagement 'the main meeting place for residents, providing for a range of both active and passive uses'.

Orientation – 130 units 41.5% do not receive northern sunlight and in the middle of winter are not likely to receive more than 3 hours solar access

Visual Privacy – How many units are within the 18 metres required separation?
How much majority of apartments comply with required separation distance?

Daylight Access – 70% of units are to receive at least 3 hours of direct sunlight between 9am + 3pm mid winter. We calculate that only 58% receive will receive it. **113**, not 20, apartments are south facing

Roof Design – flat roofs are an opportunity to provide roof gardens growing food and social interaction. They can also support photovoltaic panels so the development can generate it's own power rather than relying on the unreliable grid.

Energy Efficiency –

Basix requirements have been met. What about going beyond basix? ESD report mentions many ways of building sustainably. BUT there are no commitments to go down this path. We ask that a commitment to be a Greenstar project be mandatory.

RE: ITEM 5.13 Local Planning Instruments

Refer to Page 64:

• To provide for development of Warriewood Valley as a whole which is environmentally and economically sustainable in the short, medium and long term, with minimal financial impact on council. **Do not consider the proposal goes far enough to be environmentally sustainable**

A road network plan has been established as part of the proposal, which is in accordance with the Warriewood Valley Roads Master plan. A Traffic Impact Assessment is provided at AppendixE prepared by Halcrow MWT which concludes that the proposed development will result in good functionality at intersections and an acceptable traffic impact overall.

Contributions - for the provision of public facilities, infrastructure and services under Section 94 of the Environmental Planning and Assessment Act.

Developers in Warriewood Valley contribute towards traffic and transport, creek line corridors, open space, pedestrian cycleways, community facilities, library services and bushfire trails.

Public utility infrastructure will be augmented to support the proposed development. Correspondence from utility providers is included in this Environmental Assessment to demonstrate the water, electricity and the disposal and management of sewerage have been adequately

considered. **The Developer wants to drastically reduce the amount paid in S.94 Developer Contributions, from \$67,000.00 to \$22,218.00 per unit which does not comply with Pittwater Council S.94 payment requirements**

RE: ITEM 5.14 Development Control Plans

Refer to Page 69:

• To ensure the development is environmentally sustainable.	Yes	The development is considered to be environmentally sustainable. An ESD report is provided at Appendix F and BASIX Certificates are provided at AppendixG.
---	-----	--

**The proposal does not go far enough to be environmentally sustainable.
There are no commitments arising out of the ESD Report.**

• To ensure that future development achieves an overall standard of urban design and amenity which is commensurate with surrounding

development and provides a vibrant, pleasant and attractive neighbourhood.

Yes The proposed building design, materials and finishes provide an interesting and well articulated built form. This provides visual interest and reduces the overall perceived bulk and scale of the development, with the levels being designed to appear as separate and distinct features of the one overall development, which is necessary on a site of this size.

The proposal will still appear to have greater scale and bulk than the surrounding area and will still be out of character due to the inclusion of 5 storeyed blocks. It will set a precedence for future development which is at great odds with the Pittwater Councils future outcomes for Warriewood Valley

• To provide a sense of community and identity to the future population of the development.

Yes The development, through its design and layout has provided for communal open areas, such as bbq and seating areas, swimming pool and gymnasium building which will help to provide a sense of community within the development.

The Central Park communal area will be overshadowed and overlooked by the 5 storey blocks and will not provide a sense of community

• To ensure that development of the Valley is compatible with and does not detract from the amenity of surrounding areas particularly residential properties.

Yes The proposal responds in context to surrounding residential development, with the height limit being kept to 3 storeys to the street frontages, stepping up to 5 storeys in the middle and rear of the site. The proposed materials and finishes are compatible with surrounding development.

Refer to previous comments.

RE: ITEM 6.2 Urban design and Built Form

Refer to Page 73:

The Concept Plan has been designed so that the proposed development is located in the most suitable part of the site in regards to functionality and environmental impact, including visual amenity, ecological impact, bushfire and flooding. The layout responds positively to the site and proposed residential development giving consideration to solar access, orientation, drainage, access, views, utility provision, public access, the Warriewood wetlands and bushfire management.

The site layout results in:

- 113 units facing south with no solar access
 - 5 storeyed buildings overshadowing the wetlands and blocking visual connections from block A, B, C, D, E. The south facing units of Blocks F + g are the only beneficiaries of those views
 - the Central Park is virtually enclosed by 5-storeyed buildings resulting in overshadowing and intimidation due to the bulk and heights
- Note that Concept plans prepared by Stanasic Associates cd01 – cd05 in the Application and Declaration show Block f as 2 separate blocks. By joining them a larger bulkier building is created which cuts off visual lines to the wetlands

The 3D perspectives makes the buildings appear squat and lower. In reality a view of this type is never seen. We request a true impression from street level and also from inside the Central Park which is surrounded by 5-storeyed building.

RE: ITEM 6.3 Height

This section contains no justification as to why the 8.5metre height limit has been exceeded when every other development in Pittwater has had to adhere to?

RE: ITEM 6.5 Traffic and Street Network

A more considered design of the basement level could contain all functions involving vehicles. The internal streets at ground level could therefore be deleted and more landscaping, green areas provided

RE: ITEM 6.8 Solar Access

AS perviously mentioned 113 units are south facing and therefore will not receive northern solar access. A further units are west facing and the applicant should be asked to show that these units will receive at least 3 hours of solar access in mid winter.

Furthermore, the Central Park area will be overshadowed by the 5 storeyed blocks D + E.

Blocks F + G will overshadow the wetlands area resulting in loss of amenity in those areas.

RE: ITEM 7.1 Built Form – Height, Bulk and Scale

Refer to Page 85:

The Director Generals requirements state that:

“Address the height, bulk and scale of Stage 1 and future stages of the development within the context of the locality. Detailed envelope/height and contextual studies and visual assessment should be undertaken for Stage 1. The studies should include options for the height, siting and layout of building envelopes, open space and the road/pedestrian network and demonstrate appropriate separation between individual buildings, setbacks to roads and footpaths and any environmental buffer zones”.

The outcomes for height as outlined in Pittwater DCP 21 are as follows:

- To achieve the desired future character of the locality.
- Buildings should reinforce the bushland landform character of Pittwater and be designed to preserve and strengthen the bushland character;
- To ensure sites are designed in scale with Pittwater bushland setting and encourage visual integration and connectivity to the natural environment;
- Building design, location and landscaping is to encourage view sharing between properties;
- **Buildings and structures below the tree canopy level;**
- Equitable preservation of views and vistas to and/or from public/private places;
- The built form does not dominate the natural setting;
- To encourage buildings that are designed to respond sensitively to natural topography.

The proposed development is considered to accord with the above height outcomes, as demonstrated through overall design concept which concentrates the height of the development towards the middle and rear of the site, whilst responding to the three storey nature of the development

opposite the site at 'Warriewood Brook' to the north on Macpherson Street.

Positive urban design, built form and economic benefits including increased connectivity, aesthetic appearance and economic revitalisation are expected to result from the proposal.

The above paragraphs provide no satisfactory justification for 5 storeyed buildings to be part of this proposal:

- the desired future character of the locality does not include 5 storeyed buildings and Pittwater Council's submission will deal with this issue
- the bushland character of the area is not reinforced by a wall of 5 storeyed buildings which are more suited to a higher density urban location
- 5 storeyed buildings do not encourage visual connectivity. They cut off views to the wetlands for all blocks except south and west facing units in Blocks F + G
- the sections provided on page 87 clearly show the buildings higher than the tree canopy level and hence will dominate the natural setting and the views from local area

RE: ITEM 7.2 Open Space

The Open Space areas comprised of the Riparian zone, Wetland buffer and Asset Protection Zones will be a great asset but view lines to this open space will only be enjoyed by a few units due the site planning of the blocks.

In section 4.7 page 33-

An internal road network is proposed for the subject site. The proposed local street will be constructed and dedicated to Council.

More open space can be provided within the site if the internal streets can be deleted. The lifts from the basement can be used by removalists, emergency services etc.

Central Park – comments made previously that the space being surrounded by 5 storeyed buildings will feel intimidating and there will be deep overshadowing and overlooking. It will not be a conducive space for social interaction.

Provision for community gardens for opportunities to grow food will enhance social interaction.

RE: ITEM 7.8 Environmental and Residential amenity

Solar Access and overshadowing

Orientation – 130 units 41.5% do not receive northern sunlight and in the middle of winter are not likely to receive more than 3 hours solar access. Note: the residential flat design code 2002 require at least 70%

Views

As previously discussed the only beneficiaries of view to the wetland areas are the south to south west units in Blocks F+G. The statement that: **Views between the residential buildings, through to the wetland area to the rear of the site have been maximised through the orientation and location of the residential buildings** is simply is not correct

RE: ITEM 7.11 Ecologically Sustainable Development (ESD)

Refer to Page 100:

"A range of ESD solutions have been included in the design such as:

All the spaces are intended to be mixed mode, which will reduce energy consumption for air-conditioning.

External shading shall be incorporated to optimise daylight availability and reduce lighting energy consumption during the day.

Rainwater harvesting, each building to have a 70,000 L rain water tank capacity.

Photovoltaic panels to generate energy on the complex.

Indoor/sheltered clothes lines to be provided to all units.
All car parking areas to have zoned switching and motion sensors.
All hallways to have zoned switching, lighting to all other areas to have manual on/off switches."

Basix is mandatory and lists inclusions which in terms of sustainable development are minimal.

The ESD Report prepared by Cundalls goes further to outline many more possibilities for a sustainable development, most of which are not committed to in the proposal:

"This report reviews the principles which can be incorporated into the proposed design of the development with respect to environmental performance in the following categories:

Building Form & Fabric	Energy Consumption & Renewable Energy
Indoor Environmental Quality	Environmental Site Management
Sustainable Building Materials	Groundwater & Stormwater Management
Water Consumption	Air & Noise Pollution"
Waste Management	

Many of the initiatives are preferenced by *investigation*, *such as*, *encourage*, *being considered*. There simply is no commitment from the Developer to build sustainably!

This document is most important in terms of creating a sustainable development and as such we request that the developer commit to the initiatives included such as:

Improved energy efficiency:

Renewable sources – commit to solar, or heat pump hot water, photovoltaics or co-generation system to supply electricity. Refer to Appendix A which discusses the installation of subsidised PV arrays on units.

Lighting - commit to energy efficient lamps – LED, lighting zones, efficiency controls

Heating, ventilation + cooling – if cross ventilation and fans were provided to each unit, air conditioning will not be required.

Heating could be in the form of hydronic radiators.

Landscaping – ensure planting consists of native, drought resistant species which require reduced watering.

Groundwater and stormwater management as well as capturing water off rooftops and stormwater detention, use permeable surfaces allowing stormwater to seep directly into the earth

Sustainable Building Materials selection.

Commit to:

- ☐ Avoidance of ecologically sensitive products
- ☐ Selection of materials with a low embodied energy & high recycled content;
- ☐ Low toxicity material selection;
- ☐ Low impact on the indoor environment;
- ☐ Durability, flexibility and recyclable;
- ☐ Waste reduction

As mentioned earlier, a commitment to becoming a Green Star Multi Unit Residential Project will make a commitment to encompassing sustainable develop.

RE: ITEM 7.16 Utilities

Energy Australia confirms that they have the infrastructure to provide supply to the proposed development.

But over the last few years we have been told about the inability of the infrastructure to cope with the demand in Pittwater and there have been numerous brownouts.

Energy Australia support the project of Pittwater High School to become it's own power station by installing PV panels for those reasons.

Can Energy Australia explain how the infrasturcture is there for this development but not for the rest of the Pittwater are?

CONCLUSION

Building construction contributes to nearly 40% of greenhouse gas emissions and we need to look, in earnest, at ways of reducing these daunting numbers. A project such as this should be self sufficient in terms of power, water waste and ideally food. The systems and methods of building sustainably are there. We have mentioned 2 projects in the above text and there are many more projects that have committed to become Green Star rated through the Green Building Council of Australia.

We do not think that this proposal is consistent with Director-General's Requirement and other relevant provisions and guidelines for the reasons as described above and request that the Minister refuse the Project Application.

APPENDIX A

PROPOSED MERRITON DEVELOPMENT 14 – 18 BOONDAH RD WARRIEWOOD

Installation of subsidised PV arrays on units

Meriton have proposed a development of 600 units and a PV installation of only 38 kW for the whole development. In fact it is not clear from the DA proposal whether Meriton are fully committed to the installation anyway.

Climate Action Pittwater consider that a development of this nature should take full advantage of the available government financial assistance and incorporate as many PV panels as possible on the available roof area.

To clarify the availability of the financial assistance for the developer, Graeme Jessup representing Climate Action Pittwater contacted the Department of Climate Change and Energy Efficiency on 19 May and discussed the regulations with an officer called Michael.

Michael conformed that a developer, in this case Meriton, would comply with the regulations as the owner of each residential unit and would be able to receive the same financial assistance as a regular homeowner.

At the present time a 1.5 kW PV installation with the benefit of financial assistance would cost the developer about \$4000 per unit – perhaps considerably less with the bulk installation of so many systems.

With such a small capital cost, and the probability of a 4 year payback based on a 66c/kWh feed-in tariff, Climate Action Pittwater argues that Meriton should include as many PV installations as possible to improve the sustainable credentials of the development.

Graeme Jessup
8 Bassett St
Mona Vale NSW 2103
4 June 2010

