

## **Submission to the DOP re: Meriton Part 3A Proposal**

14-18 Boondah Road, Warriewood

Your Reference - MP 09\_0162 Warriewood Valley Redevelopment

Kamfam is the owner of 6 Boondah Road within Sector 15. This property is located directly opposite Pittwater Council Works Depot.

Our property of over one hectare is within Sector 15 in the so-called "Southern Buffer" between Warriewood Centro on Jacksons Road, the Warriewood Sewage Treatment Plant (STP) and Pittwater Road. These two sectors (including sector B) are vitally important for the overall strategic planning framework for Warriewood Valley as they represent the "Gateway" to the valley and are adjacent to the Valley's long standing and now over utilised existing retail hub - 'Centro Shopping Centre'.

In the Director General's letter to Pittwater Council dated 1 December 2009 (relating to the Part 3A application), the following statement was made

"In terms of the broader Warriewood locality (including the above sites) comprising Buffer Areas 1, 2 & 3, Sector 15 and Sector B, the Department considers that higher densities are likely to be sustainable in these areas. The land is located in close proximity to existing services and facilities and benefits from access to public transport. Following resolution of the STP buffer issues, the Department is keen to progress further investigations and understands Council is supportive of this action".

Additionally Council's letter to the Director General of the Department of Planning, dated 18 December 2009, is posted on the Department's website as Appendix X. In that letter Key Issues Point 4(d) (titled "Land Use and Density") there is a misquotation of the sentence in the Department's letter to Council, which we have cited above:

" (d) The EA must address the Director General's letter dated 1 December 2009 in relation to the stated need for a "joint strategic review ... for this area" [to consider whether] "higher densities are likely to be sustainable".

We note that the Department did not write "whether" higher densities are likely to be sustainable but stated that " ....the

Department considers that they are likely to be sustainable.”

Further the Department’s letter states in the following sentence that

“Accordingly, I would like to propose that a joint strategic review be undertaken between the Department and Council for this area. The review would include the employment and proposed recreational areas where Council has expressed interest in investigating opportunities to improve land use arrangements. The Department will undertake further investigations to determine an appropriate funding mechanism to undertake this work. The review would culminate in an agreed process to amend Council’s planning controls for the area

For numerous reasons we regard this sentence with concern.

First, it is now clear that Council may attempting to mark as appropriate certain if not all of the lands in Sectors 15 and B for “proposed recreational areas”.

Secondly, it is felt that Council has proceeded via a slow and gradual process of planning stealth to selectively downgrade the status of private lands in these two sectors. Recent events have seen the exhibition of a ‘Draft Warriewood Valley Planning Framework 2010’ substantially different to that which was adopted by Council.

Whilst the Department’s above quoted statement of Councils ‘expressed interest’ is noted it should also be noted that the past SHOROC Regional Employment Study of March 2008 by Hill PDA has made the following recommendations for Sectors 15 and B:

“Warriewood release area

This area should continue to be promoted as a location for high quality commercial floorspace in association with light industry and distributions. The Boondah road south area should be investigated for its potential contribution to employment lands and its synergy with existing office space and businesses in Vuko Place. An alternative option to be investigated is the areas designation as a B5 Business Development Zone to facilitate the provision of Bulky Goods Premises for integration with Warriewood Centro.”

The private landowners have not entered into discussion with the Council in the past to have lands utilised for “proposed recreation

areas” and this clearly is a incorrect direction for forward land use planning in what the private landowners regard as the vital role of these lands as the Gateway and future town centre role for Warriewood Valley.

Now taken in the overall context of the current Part 3A by Meriton the following scenario has been put forward by Council as detailed in its submission to the Department dated 18 December 2009 contained in Appendix X of the 3A proposal on the Department’s website.

“3 (b) The additional population generated by the increased density will require provision of additional active open space area, based on 2.83 ha per 1,000 persons. The subject site is in Buffer Area 3, which has an existing density cap of 142 dwellings and requires a net open space provision of 1.05 ha. Increasing the density to the proposed 590 dwellings would equate to 4.366ha of open space provision.

The EA must demonstrate how the additional requirements for active open space can be achieved given there is no apparent additional land available in or adjacent to Warriewood Valley.

Open space provision throughout the valley has been extensively investigated by Council staff with identification and purchase of sports fields especially difficult at the current planned density of development. The ability to provide open space for incoming residents of the buffer must be equitable to provision rates already existing in the plan and now near 50% complete.”

Putting these seemingly isolated comments together from both Council and the Department, as well as Figure 14 of the ‘Draft Warriewood Valley Planning Framework 2010’ in which a large green rectangle has been positioned over the lands of Sector 15 and B with the words “open space and recreation to be provided. Location to be determined”, leads to a conclusion that all the private lands of Sector 15 and B are somehow marked for an expansion of the existing sports fields of Boondah Road.

We are also concerned about the wording “now near 50% complete”, as this begs the question: 50% of what figure regarding active sports fields? The Council’s purchase in 2001 of the playing fields adjacent to Jackons Road and bordering the Narrabeen North Public School had fulfilled the claimed need for a total amount of 4.3 hectares of extra sports fields. It seems that Council is not

providing adequate figures as to exact needs in hectares of sports fields and seeks to utilise Sector 15 and B as the final fallback for a claimed under-provision of this public resource.

We also note and it can be seen from utilising the satellite view from Google maps that there is indeed a large ideal multi playing field sized area of land directly across Pittwater Road from Warriewood cinemas - currently used as a golf driving range. This area could accommodate three soccer fields for example and must be considered a recreation asset for the future of the area.

Returning to the Department's letter, the following sentence also concerns us,

"The review would include the employment and proposed recreational areas where Council has expressed interest in investigating opportunities to improve land use arrangements."

We are not sure what exactly "investigating opportunities to improve land use arrangements" means for our lands. As an outcome now accelerated by the Part 3A proposal we feel that both Council and the Department must provide further and immediate clarifications of this statement.

From the Departments letter of 6<sup>th</sup> April 2010 we note that the second stage of the strategic review will examine the land in and adjacent to the Southern Buffer area. We note with interest the Departments examination of the role of Warriewood as a **centre** in the context of the Metropolitan Strategy and the draft North East SubRegional Strategy.

We also note that this review will 'consider the future roles of Warriewood and Mona Vale and look at the opportunities of Warriewood to develop into a **higher order mixed use centre**.'

In all these deliberations and reviews we ask that the landowners of private lands in the Southern Buffer zone (sectors 15 and B) as it is now known, are kept considerably more in the picture with regard to future planning intent.

We also feel that, again in the context of the Meritons part 3A proposal that our lands have become the 'meat in the sandwich' in the competing Housing Strategy Visions for Warriewood valley.

As we have stated initially in this submission "These two sectors are vitally important for the overall strategic planning framework for Warriewood Valley as they represent the "Gateway" to the valley

and are adjacent to the valley's existing retail hub." We too have our own strategic 'vision' for this area and seeing the Departments active consideration of these lands as a **higher order mixed use centre** is acknowledgement of our long held opinions of the strategic value of these lands.

Clearly if higher densities are achieved in the Buffer Sectors 1, 2 and 3 (and in particular the current part 3A that we are commenting on), then a higher order mixed use centre is not just a hope but a reality for the Southern Buffer Sector.

Recent studies (Hill PDA) have shown that retail demand over the next decade or so will expand several fold in this area. With such demand needed to be captured and supplied to the immediate residents of the Valley and adjacent suburbs a centre is needed to be planned at the same time as would come from such increases in residential density as demonstrate by the current part 3A application and its sister ones to come.

We would be pleased to attend any early meeting with the Department in regard to the matters raised in our submission and indeed in any future planning for our sectors.

Yours faithfully,

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