



Northern Beaches Local Housing Strategy – Submission Summary Report

Northern Beaches Council

08 | 04 | 2021





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Submission's summary

This report provides a summary of the submissions received from the exhibition process for the Northern Beaches Draft Local Housing Strategy (LHS). The following sections summarise:

- The number of submissions received
- The key themes/issues raised in the submissions, and
- Proposed responses to address the key themes/issues, and any changes in the Final LHS.

More detailed responses to have also been provided to submissions from the following NSW Government agencies, community groups and consultants:

- NSW Health – Northern Sydney Local Health District
- NSW Environment Protection Authority (EPA)
- Metropolitan Local Aboriginal Land Council (MLALC)
- Community Housing Industry Association NSW
- Shelter NSW
- Link Housing
- Mona Vale Residents Association
- Duffys Forest Resident Association
- Newport Residents Association
- Avalon Preservation Association
- Pittwater Natural Heritage Association
- Clareville and Bilgola Plateau Residents Association
- The Palm and Whale Beach Association
- Pittwater Community Alliance
- Greater Manly Residents Forum
- Friends of Narrabeen Lagoon Catchment
- Warringah Urban Fringe Association Incorporated
- Non-Smokers Movement of Australia Inc
- Australian Labor Party (Pittwater)
- Property Council of Australia
- Creative Planning Solutions on behalf of Sunnyfield
- Ethos Urban on behalf of Sunnyfield Disability Services and Cerebral Palsy Alliance (185-189 Allambie Heights Road)

- Platino Properties (5 Skyline Place, Frenchs Forest)
- Macroplan Holdings
- SJB Planning on behalf of the Henroth Group
- Toga and Capitol Investment Pty Ltd (1-3 Rodborough Road, Frenchs Forest)
- Urbis on behalf of LIF Pty Ltd (Allambie Grove Business Park)
- Urbis on behalf of Manly Leagues Club
- Urbis on behalf of Dee Why RSL
- BBF Town Planners on behalf of owners of 65-67 Veterans Pde, Collaroy Plateau
- Willowtree Planning on behalf of EG (100 South Creek Road, Cromer)
- Keylan Consulting on behalf of Catholic Archdiocese of Sydney
- Urban Taskforce.

Submissions received

The Draft LHS was released for public exhibition and submissions from 15th January 2021 to 7th March 2021. Over this period 622 submissions were received from the community.

Community members providing submissions through Council's YourSay platform, and were asked to provide free text responses to the questions outlined in the table below. Not all responses answered these questions specifically, with some only providing responses to certain questions. Many comments provided covered a range of issues and themes. Some community members also uploaded separate attachments. Detailed consideration of the submissions and responses to the issues raised is provided in the following sections.

TABLE 1: SUMMARY OF RESPONSES TO YOURSAY QUESTIONS

YourSay questions	Comments received	Response
'Do you have any comments about the Centres Renewal Framework to be applied to the five centres identified for detailed master planning?'	Comments were mixed on the Centres Renewal Framework, and also raised a number of separate but related issues, such as infrastructure implications and concerns with potential housing densities.	See discussion and response to items 1, 2, 3, 6, and 8 in Tables 2 and Table 3 below.
'Do you have any comments on our proposed target of a further 1,880 social and affordable housing dwellings to meet additional housing demand to 2036?'	Comments were mixed on the target for social and affordable housing, with some comments raising concerns about the potential impacts (including around boarding houses and seniors housing) and others expressing support for actions to address this need.	See discussion and response to items 4, 5, 7 and 9 in Table 2 and Table 3 below.
'Do you have any other suggestions on how we might deliver social and affordable housing?'	Some comments provided suggestions for approaches and other things to consider in delivering social and affordable housing in the LGA.	See discussion and response to item 4 in Table 2 and Table 3 below.
'Please provide your submission or any additional comments.'	Many responses provided additional comments on other issues, such as queries around population projections and State Government targets, plans for Ingleside and Frenchs Forest, and a need for higher quality design outcomes in housing development.	See discussion and response to items 6, 8 and 10 in Table 2 and Table 3 below.

Key themes and issues raised

SGS's review of the responses included identifying themes and issues raised in each submission. These issues were then grouped to identify the key themes that require responses and changes in the Final LHS.

Across the submissions there were a range of comments – some supportive and some with concerns or queries. The consistent key themes that emerged are illustrated in the table below.

TABLE 2: KEY THEMES/ISSUES RAISED IN SUBMISIONS

Theme/issue raised	Approx. % of submissions where mentioned
<p>1. Concerns with the potential impacts of new housing on infrastructure</p> <p>The most prominent issue raised in the submission was concern about the impact of new housing in the centre investigation areas and local centres identified in the LHS. While there were concerns about this issue in general across the centres identified, they most commonly related to:</p> <ul style="list-style-type: none"> – Mona Vale, and to some extent the rest of the former Pittwater area – Dee Why – Narrabeen – Manly. <p>Specific concerns included in relation to impacts on:</p> <ul style="list-style-type: none"> – Traffic and parking, with traffic congestion highlighted in many areas including Mona Vale, Manly Vale and Narrabeen – Public transport, with existing services described as inadequate and over capacity (including the B-Line) – Schools, particularly around Mona Vale and Narrabeen areas in the north – Green and open space, with concerns that these will be lost to development – Hospitals, with the closure of the Mona Vale hospital and now a heavy reliance on Frenchs Forest hospital for the whole LGA (and associated transport issues to get there from some areas). 	55%
<p>2. Concerns with the selection of centres for renewal and change</p> <p>Some submissions raised concerns with the selection of particular centres for future investigation and potential renewal and change, particularly the potential built form outcomes resulting from increased housing densities and the resulting impact on the character of existing neighbourhoods.</p> <p>Areas that were most noted where this is a concern were:</p> <ul style="list-style-type: none"> – Mona Vale – particularly potential building heights and the impact of increased densities on the village character of Mona Vale as a centre 	32%

<ul style="list-style-type: none"> – Dee Why – due to the amount of housing development that has already been accommodated in the centre in recent years, and concerns that further development will lead to over-development – Narrabeen – regarding capacity for new housing and environmental constraints such as flooding in the area <p>Some suggestions were provided for other centres and areas that could be considered for more development than indicated in the LHS – see list below.</p>	
<p>3. Support for the overall LHS approach</p> <p>Some submissions identified support for the broad approach of the draft LHS, to concentrate growth and increased housing densities in key centres along transport corridors, provided that the growth is managed and designed appropriately and responds to local character and issues.</p> <p>This included support for the 5 key centres identified as investigation areas and for the overall approach of allowing for more medium density typologies.</p> <p>Some submissions also suggested additional locations that could be considered for increased densities above what is suggested in the draft LHS, including Forestville, Beacon Hill, Terrey Hills, Belrose, Ingleside and Killarney.</p>	18%
<p>4. Support for actions to address housing affordability</p> <p>Submissions indicated support for the proposed actions in the draft LHS to address affordability issues in the LGA, provided that new housing is delivered appropriately. Comments included:</p> <ul style="list-style-type: none"> – Support for the identified target to address the projected future need for social and affordable housing (SAH) – Support for more SAH being delivered provided that it is designed appropriately (i.e. not just cheap housing) and for the benefit of the community – Suggestions to target affordable housing to key workers to support the Northern Beaches economy and local employment – Support for SAH to be delivered close to transport infrastructure – Support for delivering a wider housing mix including medium density typologies to provide more affordable options for all income levels, including young families – Support for using mechanisms such as affordable housing contributions or inclusionary zoning to facilitate delivery of more stock – Noted that it is important that SAH isn't concentrated in large estates 	16%

<ul style="list-style-type: none"> – Support for investigation of models such as the Nightingale model for community living style developments as options – Support for housing to accommodate people with disabilities, including younger people – Recognition that SAH is important for having a diverse population. 	
<p>5. Concerns with potential impacts of increased SAH</p> <p>Some submissions raised explicit concerns with facilitating more SAH being delivered in the LGA and potential negative impacts. Concerns related to this included potential impacts on property values, crime, and existing issues with concentrations of social housing in locations such as Narrabeen and Warriewood. Some submissions also noted that there is a distinction between social housing and affordable housing, which service different household needs, and may need to be treated as two separate things.</p>	7%
<p>6. Concerns about the Northern Beaches having to meet State Government targets</p> <p>Some submissions raised concerns about Council being required to adhere to projected population growth and housing targets set by the State Government. This included concerns about being required to accommodate a higher level of population growth than may be needed, with suggestions that COVID would reduce the need for housing to be provided. Other comments were also opposed to supporting population and immigration growth due to environmental factors at a more general level.</p>	6%
<p>7. Concerns with allowing for boarding houses in the LGA</p> <p>Some submissions raised specific concerns around allowing for boarding houses in the LGA altogether. A number of submissions mentioned issues with existing boarding house developments that have been delivered, including with parking and impacts on other residents nearby.</p> <p>Submissions also raised concerns that the new age boarding houses that are being delivered are not actually affordable and meeting need for households in housing stress, with rents in these developments being comparable to other dwellings.</p>	5%
<p>8. Support for higher quality design outcomes</p> <p>Some submissions raised the issue of design quality, and that in the implementation of the LHS, attention will need to be given to ensure that design outcomes for new housing is of a higher standard than has been delivered in the past. This was</p>	3%

particularly noted for any future higher density development. Some also noted the importance of future designs adhering to the existing character of the Northern Beaches.

9. Support for seniors housing and changes to suggested locations

Some submissions raised concerns around the potential locations identified in the draft LHS for seniors housing.

This included that there could be other parts of the LGA that would also be suitable for seniors housing than what is proposed, including those further away from the major centres and regular transport.

Other submissions raised that there need to be more opportunities and support for older residents to downsize, noting that this is not suitable for people with the type of housing being delivered (i.e. apartments).

3%

10. Queries regarding plans for Ingleside and Frenchs Forest

Some submissions raised questions around the status of areas for which the planning is being led by the State Government – namely Ingleside and Frenchs Forest. This included request for clarity about when areas will be rezoned and general questions about the future plans for these areas.

2%

Response to submissions/incorporation into Final LHS

The table below provides the proposed actions to integrate into the Final LHS to address the themes raised.

TABLE 3: PROPOSED ACTIONS TO RESPOND TO THEMES/ISSUES IN FINAL LHS

Theme/issue raised	SGS comments	Proposed response/changes to LHS
1. Concerns with the potential impacts of new housing on infrastructure	<p>It is likely that new housing will increase pressures on local and regional infrastructure.</p> <p>Identifying the implications for infrastructure will be a key part of the future planning done for the Centres Investigation Areas.</p> <p>This will need to consider the issues raised in the submissions, including impacts on transport, traffic, environmental sustainability and climate change, and social infrastructure such as schools.</p> <p>Council has the opportunity to use development contributions plans or development approvals processes to require contributions from new development to support the necessary infrastructure upgrades to match growth and/or to mitigate direct impacts.</p> <p>Council will need to work with the State Government to deliver any more significant upgrades to regional infrastructure, including transport, over time.</p>	<ul style="list-style-type: none"> – Add a text box to the exec summary on page 10 (e.g. similar to pink box on p.8) with text: <p>“Priority 9 of the Local Strategic Planning Statement seeks to ensure that provision of infrastructure accompanies growth in the housing and employment sectors in areas where urban renewal is occurring. The development of an LGA-wide (land use) infrastructure implementation plan will look to align all types of infrastructure planning with growth, based on housing, employment and social infrastructure studies and additional studies as required.</p> <p>This will include detailed planning for each of the Centres Investigation Areas to determine the appropriate level of new development that can be accommodated.</p> <p>This will consider potential impacts on local infrastructure, including transport, traffic, environmental sustainability and climate change, and social infrastructure such as schools. The need for new infrastructure will also be informed by other Council strategies, such as the Social Infrastructure Study, Open Space and Recreation Strategy, and a land use and infrastructure implementation plan.</p> <p>The Centres Investigation Areas will be considered individually to reflect their unique character and circumstances. This means that what is planned in Mona Vale will not be the same typologies or scale of development centres like Dee Why or Brookvale.”</p>

- **Add text to sentence after 'underutilised land' in first paragraph of page 79:**

... underutilised land "(not including existing open or green space)" could be ...

- **Add a text box on page 109 (e.g. similar to pink box on p.8) with text:**

"Detailed planning for each of the Centres Investigation Areas will be undertaken to determine the appropriate level of new development that can be accommodated.

The Centres Investigation Areas will be considered individually to reflect their unique character and circumstances. This means that what is planned in lower-density locations such a Mona Vale will not be the same typologies or scale of development as larger and higher density centres like Dee Why or Brookvale."

- **Add text to end of last sentence in paragraph 2 on page 132:**

... NSW Government agencies "to plan and facilitate larger infrastructure upgrades."

- **Add action in table for detailed planning for centres (Table 20) on page 132:**

Add row to table below 'report against capacity gap', with text:

(in first column) "Use LHS to inform review of development contributions plans to fund infrastructure upgrades from new development"

(in second column) "Ongoing"

(in third column) "Council, DPIE"

- **Add text to end of dot point 3 under 'A comprehensive strategy' on page 133:**

... Council-owned sites or community-owned sites "(not including open or green space)"

2. Concerns with the selection of centres for renewal and change

The centres identified for potential renewal in the draft LHS, as either Centre Investigation Areas or Local Centres, have been based on consideration of several factors, including:

- Proximity to transport services – current and planned future routes (such as the B-Line)
- The North District Plan hierarchy of centres (i.e. Strategic Centres being Mona Vale, Brookvale, Dee Why, Manly and Frenchs Forest, local centres)
- Council's hierarchy of centres within LEPs (i.e. local centres, neighbourhood centres, etc.) and the Northern Beaches Local Strategic Planning Statement (LSPS)
- The existing character and potential to accommodate new development (i.e. some smaller centres won't be able or appropriate to accommodate new housing).

Some of the additional centres suggested for additional renewal in the draft LHS are less appropriate due to the above criteria. For example, centres like Belrose and Terrey Hills are much more isolated in terms of the B-Line public transport.

Forestville and Beacon Hill were also raised as suggestions. The draft LHS has identified both as potential future renewal areas, subject to the future B-Line route being in place (which is still yet to have a firm commitment or timing). This is to ensure that sufficient infrastructure is in place to support growth. This is explained in the text.

While the five Centre Investigation Areas (Mona Vale, Narrabeen, Dee Why, Brookvale and Manly Vale) are illustrated in the draft LHS maps in the same way, this does not mean that each will be planned in the same way or see the same amount of development in future – i.e. Mona Vale is not proposed to see the same heights or intensity of development as Dee Why. Rather the detailed planning phases to come will consider what is appropriate for each location – if higher densities are found to be

- **Replace pink text box on page 8 with:**

“Centre Investigation Areas

This strategy identifies Brookvale, Dee Why, Mona Vale, Manly Vale and Narrabeen along the existing B-Line as centre investigation areas in the medium term, and Forestville and Beacon Hill in the longer term, subject to a future B-Line route.

Dee Why already contains high density housing in the form of apartments, and only Brookvale and Frenchs Forest are were identified in Towards 2040 as having longer term opportunities for higher density housing.

The focus of centre investigation areas therefore is to investigate opportunities for low-rise medium density housing around the centre, such as terraces and multi-dwelling housing.

Detailed planning for Brookvale will take into account their important role for local employment.

Low rise housing diversity areas

This strategy identifies Avalon, Newport, Warriewood, Belrose, Freshwater, Balgowlah and Manly as areas to support housing diversity in the form of dual occupancies, seniors housing and boarding houses.

This will create more diverse forms of housing across the LGA in locations with good access to shops and services.

Detailed planning for Manly will look to balance visitor accommodation with housing for permanent residents."

- **Add sentence to end of last paragraph on page 64:**

"Plans for renewal will also reflect the existing character of each centre - meaning that what is suitable for Dee Why will be different to what is suitable in Mona Vale."

- **Add text to end of sentence at end of third paragraph on page 110:**

	<p>not appropriate or viable in a centre, given the more detailed investigations of its' characteristics, then changes won't be made to planning controls to facilitate further housing development..</p> <p>Future planning for centres, which have key employment uses (Brookvale being the key one), will need to be planned for with regard to the Northern Beaches draft Employment Strategy and Brookvale Structure Plan.</p> <p>The radius of the areas being considered for investigation and renewal for strategic and low-rise housing diversity centres have been changed to 800m and 400m respectively. This is will be based on a more refined consideration of walkability and also the desirability of a smaller investigation area for local centres.</p> <p>Terrey Hills has also been removed from consideration for low-rise housing diversity due to bushfire risks.</p>	<p>... with the Brookvale Structure Plan "and the Draft Northern Beaches Employment Strategy."</p> <ul style="list-style-type: none"> – Change sentence in paragraph under 'Tailored application' on page 125: <p>"Brookvale may be able to accommodate some more high density residential and mixed use development. Dee Why and Mona Vale may see some more medium density development, whereas smaller centres like Narrabeen (or Forestville and Beacon Hill into the future) would only accommodate low rise, low to medium density development in mixed housing and influence areas."</p> <ul style="list-style-type: none"> – Changes to maps and text in the LHS document are identified to reflect the changed radii around centres. – Changes to maps and text in the LHS document are identified to reflect removal of Terry Hills from consideration.
3. Support for the overall draft LHS approach	<p>Some submissions expressed support for the draft LHS approach, logic and the centres identified for renewal (as investigation areas or as local centres).</p> <p>This was qualified in some instances by saying that infrastructure considerations would also need to be addressed.</p> <p>Additional locations for renewal were also suggested, such as Forestville Beacon Hill, Terrey Hills, Belrose and Killarney. However, as above discussion with the rationale for the selection of centres, some of these are less appropriate for increased densities due to their existing characteristics/size and proximity to B-line transport.</p>	<ul style="list-style-type: none"> – No additional changes – changes noted above address this.
4. Support for actions to address housing affordability	<p>Submissions around this issue included a variety of comments and suggestions, many of which are discussed already in the draft LHS as options for future consideration, such as implementing inclusionary zoning for an affordable housing contribution (for all</p>	<ul style="list-style-type: none"> – No changes proposed for LHS. Future planning for affordable housing should consider these issues.

	<p>development that leads to a net increase in dwellings) to assist in providing additional affordable rental housing supply.</p> <p>It is recommended that in response, Council's future planning for SAH ensures that new dwellings are delivered in close proximity to transport, is designed appropriately, and is not concentrated in large estates than has been done in the past (there was not the intention to deliver large estates). Consideration could also be given to how to ensure that affordable housing is available for key workers on low to moderate incomes.</p>	
<p>5. Concerns with potential impacts of increased social and affordable housing (SAH)</p>	<p>These types of concerns about SAH concentration are often raised when new development is proposed. Current policies around the provision of SAH have shifted towards more dispersed dwellings rather than large concentrations of housing in estates – which appears to be where some of the issues noted in the comments are concerned about. Having more dispersed provision can reduce these potential impacts. An affordable housing contribution would also seek to provide dispersed provision of additional supply, either as a part of private development in renewal precincts, or as a pooled contribution from development more broadly (subject to DPIE approval).</p> <p>The detailed centres planning to be undertaken will consider issues around higher density living in general.</p> <p>The Northern Beaches has a significant housing affordability problem, and not just for people who require social housing (noting that the LGA has a low proportion of social housing compared to other areas), but low to moderate income families and younger adults who have grown up in the Northern Beaches (as noted in the some of the submissions) and are forced out of the area to access housing.</p> <p>Council's target proposes to seek to address the projected future need – there is a still a large backlog to be addressed which is evidence of the significant need in the area. Fundamentally, the</p>	<p>– Add text to end of first paragraph on page 40:</p> <p>"As of September 2020, the median rent in the LGA was \$650 per week, compared to \$495 across Sydney. The median dwelling price at this time was also over \$1.5 million, compared to only \$690,000 for the rest of Sydney. The Northern Beaches LGA has historically also had lower proportions of social housing than the rest of the metropolitan area."</p> <p>– And add a footnote for \$ figures in above text as:</p> <p>"Department of Communities and Justice Rent and Sales Statistics, March 2021."</p>

	<p>private market will not be able to deliver this kind of housing without strategic planning by Council but also involvement from State and Federal Governments who have the primary responsibility for affordable housing.</p> <p>The distinction raised between social housing (i.e. public housing for very low income households) and affordable housing (for low to moderate income households in housing stress) is an important one, and it is agreed that these need to be considered slightly differently in their delivery, as they are targeted to different household types, and social housing is subject to the NSW Government provision. The focus for Council will be opportunities for the use of the planning system for delivery of an affordable housing contribution, as well as facilitating lower cost private market housing options.</p> <p>The draft LHS includes a breakdown of the projected future demand by type. Different approaches for delivery will need to be considered by Council in the preparation of its affordable housing action plan.</p>	
<p>6. Concerns about the Northern Beaches having to meet State Government targets</p>	<p>This is a policy question for Council more broadly as to whether to follow DPIE population projections. Currently, DPIE projections are the official projections used by the State Planning Department and the GSC for Regional and District Plans (which the LSPS and LHS are required to put into effect), though new projections to reflect COVID impacts have not yet been released. There is likely to be an impact short term on population growth in Australia and Sydney due to declining international migration. It is unclear how long this will last.</p> <p>DPIE has provided a response to Council on the impact of Covid which has been incorporated into the proposed change to the LHS on this theme – on the need to plan for growth longer term. The draft LHS also already notes that projections in the LHS may need to be updated in light of COVID.</p>	<p>– Add to pink text box on page 43:</p> <p>"While there could be reduced demand for housing from lower population growth, there is still a need for greater housing choice, and for place-based planning to ensure that Council can meet the changing needs of the community over time."</p>

	<p>While there are likely to be some impacts from the pandemic on migration (particularly in the short term), Council’s focus should be on strategic planning for housing for the long term needs.</p> <p>Planning strategically for growth in the long term will put Council in a better position to respond to the need for infrastructure and changes in the population as they occur up to and post-2036.</p> <p>However, if the population doesn’t increase as fast as expected, some centres may not need to be investigated in detail as urgently, but there is still need to have a clear strategic direction. Council should continue to monitor the impact of Covid and the rates of growth on a regular basis and update its strategies as a result.</p>	
<p>7. Concerns with allowing for boarding houses in the LGA</p>	<p>Some comments raised specific concerns about boarding houses – particularly the impacts of new age developments in the LGA in recent years on parking, and that they aren’t being used as affordable housing.</p> <p>The issues around how affordable, boarding houses are to low income households is already noted on page 48 of the draft LHS. Design provisions around boarding houses could be considered in more detail subject to Council receiving an exemption from the SEPP.</p> <p>The draft LHS is already proposing to limit where these can go compared to what applies now under the SEPP, which would only see boarding houses in areas with good access to transport and services, surrounding identified centres. In addition, the focus is on the provision of boarding houses by a public authority or a community housing provider would also promote the provision of affordable boarding house options for the community.</p> <p>Given that boarding houses are more like a medium density built form typology, removing provision allowing them in areas of the R2 zone outside of the nominated centres has been included.</p>	<ul style="list-style-type: none"> – No change proposed – design provision can be considered in detailed planning.

	Changes in the housing affordability SEPP by the State Government may change the requirements for Council, and have been foreshadowed to separate definitions of boarding houses from co-living.	
8. Support for higher quality design outcomes	Some submissions raised the importance of any new development in the LGA being designed to a high standard and responding to its existing character. This will be considered as part of the detailed planning phases for each centre and is supported.	<ul style="list-style-type: none"> – No change proposed – design will be considered in detailed planning phases, and is noted already in the draft LHS.
9. Concerns around potential locations and options for seniors housing	<p>Seniors housing will be increasingly important for the LGA as the community ages. The draft LHS has specific actions for seniors housing including developing specific controls subject to the SEPP exemption being granted. The draft LHS is proposing to allow for seniors housing in accessible locations, and in the R2 zone outside these areas only where there are existing aged care sites and facilities. In addition, the potential for redevelopment and changes to existing retirement villages to meet the changing needs for additional support, are also proposed. The draft LHS also discusses the opportunity for a bonus to encourage seniors housing to be provided in centres.</p> <p>The broad approach of the draft LHS to diversify the dwelling mix in the LGA will also provide opportunities for existing residents to downsize from larger properties to townhouse or terrace style dwellings in close proximity to centres.</p> <p>Submissions which provided suggestions for other locations that could be considered are based on where land may be available. However, the approach of the draft LHS is to ensure that new seniors housing is provided in accessible locations and away from potential hazards (such as bushfire risk). It is not recommended that the approach change to encourage more seniors housing developments in less accessible areas.</p>	<ul style="list-style-type: none"> – No change proposed – need for greater housing diversity to cater to older people and approach for having seniors housing around centre is already outlined in draft LHS.

10. Queries regarding plans for Ingleside and Frenchs Forest

The draft LHS had not included these areas, due to either the uncertainty surrounding their plans, or that planning will be done through separate processes by the State Government. The planned number of dwellings in the Frenchs Forest precinct has been included as an overall figure to understand the capacity in the LGA.

The draft LHS notes that the State Government is planning for both of these areas. Updated wording has been provided regarding the status of Ingleside for incorporation in the draft LHS.

It should be noted that the approach adopted in the draft LHS for the appropriate location of housing does not include Ingleside, due to the lack of accessibility to the B-line.

Council officers are considering the inclusion of the planned dwellings at Ingleside in the capacity calculation and discussion of future supply, following advice from DPIE on their planning intentions.

– Add a text box to page 53 with text:

"In relation to Ingleside, there is potential for a maximum of approximately 1000 dwellings. This is scheduled for potential public consultation to occur in the first half of 2021 and the final dwelling numbers will be subject to the outcome of that process."

Source: SGS, 2021.

Detailed response to submissions

Additional responses to some of the submissions has been requested by Council. These are provided below.

NSW GOVERNMENT AGENCY SUBMISSIONS

NSW Health – Northern Sydney Local Health District

This submission supports the Draft LHS approach of focusing new housing growth around accessible centres, the objectives for new housing to follow the principles of sustainable development, and retaining existing green space, and the health benefits resulting from these approaches. The submission also cites data compiled by the NSLHD, which demonstrates that many of the centres identified in the Draft LHS have residents who are likely to suffer financial stress due to a high cost of living and a lack of government owned or community housing stock.

Response

The submission provided recommendations for Council to consider. These are addressed below.

Comment from submission	Response
That instead of using a simple 1-kilometre radius of centres to determine where to increase density, Council consider a more nuanced, five-minute walk from centres, considering typography, street layout and similar hindrances to walking on the flat, 'as the crow flies'.	Agreed – Council is undertaking this work internally to identify walkable distances which will inform the implementation of changes in the LEP and the centre investigation area planning. The areas being considered for renewal have also been reduced to 800 metre radii for investigation areas and 400 metre radii for low-rise housing diversity centres. This is the next level of detail from the broader LHS.
That Council not only considers proximity to local centres as criteria for increasing density, but also incorporates other liveability factors such as proximity to quality, green space and other community open space.	Noted – these factors will be considered in the detailed planning phases for centres to come to ensure investigation areas and new housing have appropriate accesses to green space.
That Council refer to the Healthy Built Environment Checklist to assist it with determining factors to take into consideration, to improve walkability and liveability, in the centres proposed for higher density	Noted – this can be considered in the future detailed planning phases.
That Council ensures the Housing Strategy allows for more medium density, social and affordable housing in centres with low proportions of social/community housing and high rental stress.	Agreed – this is one of the key aims of the draft LHS, and will be part of the detailed planning phases.

NSW Environment Protection Authority (EPA)

This submission supports the visions outlined in the Draft LHS, including principles to achieve lower energy and water use, encouraging alternate modes of transport, and respecting existing environmental features.

The submission provided further information for consideration regarding:

- Priority 2: Detailed planning for centres, and
- Priority 4: Precinct sustainability and housing.

Responses to these suggestions are addressed below.

Comment from submission	Response
Priority 2: Detailed planning for centres	
Air quality – suggestion to specify that residential development be set back from busy roads, have vegetation between buildings and road, and that private open space faces away from the road. Measures suggested are detailed in the <i>Development near rail corridors and busy roads – interim guideline</i> .	Agree – these factors will need to be considered in the detailed planning phases for each centre, as the interface with busy roads is a factor in many Northern Beaches centres.
Noise – strategic planning can be used to minimise noise impacts on communities – including through separation of incompatible land uses, and best practice design and siting. Design excellence competitions, guidelines and design review panels can be used to deliver high amenity and liveability outcomes.	Noted.
Contaminated land – a range of activities can result in contaminated land and environmental and health risks if not managed properly. Important that housing is only in places that are suitable for development. SEPP 55 and other guidelines can help inform this.	Noted.
Priority 4: Precinct sustainability and housing	
Waste and resource recovery – LHS is an opportunity to embed the circular economy directions in the NSW Circular Economy Policy Statement and 20-Year Waste Strategy, including terminology around ‘circular economy’ and circular economy design.’	<p>Agreed – text to be added to LHS to include circular economy as a consideration.</p> <ul style="list-style-type: none">– Add another dot point to page 92 to say: <p>"embedding the circular economy in the design of buildings, infrastructure and the public domain to maximise the circularity of the materials used in construction."</p>

METROPOLITAN LOCAL ABORIGINAL LAND COUNCIL (MLALC)

This submission was prepared with assistance from City Plan Strategy for the Metropolitan Aboriginal Land Council. The submission has a focus on the potential impact of the housing strategy on the MLALC's plans for its land in the Northern Beaches LGA, with particular reference to the site known as Lizard Rock to the east of Belrose in the Deferred area, and for the MLALC to deliver its statutory objectives under the *Aboriginal Land Rights Act 1983* (ARLA). Key points raised in the submission relating to the Draft LHS include:

- Housing targets – that the draft LHS does not attempt to address the demand for detached/low density housing in the LGA.
- Social and Affordable Housing – that Council's 10% affordable housing contribution would apply to the Lizard Rock site and deliver SAH, and that MLALC development would provide community benefits.
- Spatial planning framework and absolute risk areas – that the Lizard Rock site should not be identified as an area unsuitable for development, given its relative proximity to the Belrose centre and the investigations that have gone into planning for the site around bushfire and other issues.
- Aboriginal land – concern that there is no action in the draft LHS regarding the use of Aboriginal land in the LGA, and that there needs to be more consultation with the MLALC on the strategy.

Response

In summary, the proposed Lizard Rock development is not supported by the objectives and approach in the Draft LHS. The Draft LHS has a focus on concentrating development around key centres with access to the B-line in order to increase housing diversity in the LGA, locate new housing in good proximity to services, and reduce the need for the existing natural environment of the Northern Beaches to be lost to and encroached upon by development.

- The draft LHS acknowledges that there is demand for detached/lower density dwellings, however, this is also the most predominant housing type in the LGA currently and if unrealised this demand will make choices based on complex housing type, location and cost issues. The focus of the draft LHS is to increase the diversity of housing available, through allowing for more low-medium density housing typologies within lower density neighbourhoods adjoining centres rather than expansion of low-density suburbs. While there will be demand from, for example, younger families, this can also be catered to through medium-density housing forms from a preference but also from an affordability perspective.
- It is agreed that MLALC developments are able to provide opportunities for social and community benefits.
- The Draft LHS did not do detailed investigations on the Lizard Rock site. The focus was on identifying areas for future housing in the draft LHS was on limiting the impacts of housing expansion into existing vegetated areas.
- The draft LHS has also identified that there is likely to be sufficient capacity to accommodate future housing demand in the LGA through focusing new development around the centres in existing urban areas, without the need to encroach on existing undeveloped areas such as the Deferred Area and the MRA.
- It is noted that there is no action regarding the use of Aboriginal land in the LGA. Implications of the draft LHS for individual landholders and specific sites has not been considered in detail given the

strategic/higher level focus that is required for this type of document. It would be appropriate to include action regarding working with the MLALC regarding use of aboriginal lands as part of the draft LHS.

Council has undertaken a meeting with the MLALC since this submission was received, from which it was agreed that some amendments to the LHS will be made to reflect the MLALC's role as a large land-owner for the LGA and status of the Lizard Rock proposal. The proposal as presented by the MLALC is under review by the Department of Planning, Industry and Environment.

COMMUNITY HOUSING INDUSTRY ASSOCIATION NSW

This submission welcomes the approach of the Draft LHS to develop a strategy to consider the range of levels available to support the growth of affordable housing. The submission notes that housing in the LGS is not affordable for lower income households including key workers, with flow-on negative impacts for households. The submission provides the following recommendations:

- CHIA NSW recommends that Council take concrete steps to plan for the full need for social and affordable housing identified in Council's Local Strategic Planning Statement Towards 2040 (not just the additional demand arising over the Strategy period). This would support developers, State agencies and community housing providers to work together to deliver new housing that meets Council's long-term expectations about the delivery of affordable housing in the area.
- Council should take a strategic, long-term approach to implementing affordable rental housing targets that steps up the affordable housing requirement over time, in line with expected improvements in development feasibility.
- Council should consider how best to work with the community housing industry to achieve the goals outlined in the housing strategy. As previously mentioned, CHPs are well experienced in the delivery and of affordable housing in partnerships, CHIA NSW would be glad to facilitate discussions where appropriate.
- Given current (and continuing) shortfall of affordable housing identified, a clear policy for the provision of affordable housing must be prepared. This document would identify the role of policy positions and levers such as Voluntary Planning Agreements, Inclusionary Zoning, Joint Ventures, etc. This document would provide a clear signal to stakeholders that Northern Beaches Council has placed a high priority on housing affordability.
- Council revisit the restrictive measures preventing the development of new generation boarding houses. Council should resolve to allow developments of more than 12 units to allow for innovative solutions to housing need. As previously stated, these dwellings provide an important resource for key workers, students, and older persons.

Response

It is agreed that Council could work with CHPs to implement the actions and goals outlines in the LHS. The LHS includes an action to develop an affordable housing action plan for the LGA. The target for the provision of social and affordable housing could be increasing in future by Council. While acknowledging that the proposed approach for boarding houses may limit their viability in some areas, community feedback has indicated issues with the delivery of these types of developments in the past, and it is therefore important that these are provided in suitable locations. Detailed future planning around the key centres will identify opportunities for boarding houses.

SHELTER NSW

This submission was provided by Shelter NSW. The submission supports the inclusion of an affordable housing contributions rate, and provides suggestions for Council including:

- To set an affordable housing target of 10% of all housing stock
- To include residential and non-residential land use zones as part of affordable housing contributions for areas undergoing redevelopment, such as that used by the City of Sydney
- To include affordable housing in Council's Planning Agreement framework
- Consideration of build-to-rent models, using SSD projects to deliver more SAH
- Concerns with boarding houses and how they have been delivered in recent years under the SEPP
- Working with the Local Aboriginal Land Council to deliver housing opportunities
- Support for the LHS priorities around precinct sustainability
- To develop a strategic framework for seniors housing.

Response

Council will be developing an affordable housing action plan, which will need to consider the issues raised in this submission, including the potential delivery models and mechanisms to facilitate SAH as part of new developments.

LINK HOUSING

This submission provided by Link Housing expresses support for the overall approach of the LHS to focus housing around centres. The submission notes there could be opportunities to consider the proximity of housing to social infrastructure, and to consider tenure types as well as housing types. It is noted that mixed housing areas may provide the best opportunity for SAH delivery. Suggestions raised in the submission also include to identify opportunities for the provision of SAH more clearly and the potential yield of SAH from the renewal centres. It was noted that the SAH target adopted in the LHS is based on an already low proportion of SAH in the LGA, and a higher target could be considered. The submission supports boarding house developments being delivered by CHPs, and encourages Council to consider models such as build to rent, shared equity, and shared ownership options operated by CHPs.

Response

The future detailed planning around the centre investigation areas will consider many of these issues in more detail than is possible for the LHS. Council will also be preparing an affordable housing action plan which will consider the provision of SAH specifically, including appropriate targets.

MONA VALE RESIDENTS ASSOCIATION

Mona Vale Residents Association provided three submissions on the Draft LHS.

First submission

The first submission was provided as an interim submission and broadly raised:

- The need to consult with residents potentially affected by changes around the Mona Vale Centre

- While supporting of the housing analysis and overall direction of the strategy, concerns with the application of the Centres Renewal Framework in Mona Vale, with clarity required on the potential typologies and building heights proposed for the area, and relation to the Mona Vale Place Plan
- The need to balance new housing with job opportunities in Mona Vale given its existing role as a commercial centre, and address the need for infrastructure to accompany growth
- The need to ensure that centres are not treated with a one size fits all approach, and
- Clarifications required around how detailed investigations and implementation will be undertaken.

Second submission

The second submission built on the above, with additional points raised around:

- Concerns with the potential scale and pace of redevelopment in the Mona Vale centre and suggestions to cap building heights at 4 storeys, with a further acknowledgement that Council has committed to not increasing building heights in Mona Vale
- Suggestion to exempt Mona Vale as a strategic centre until the Place Plan has been completed.
- Concerns with actions to seek exemptions from SEPPs
- Request to remove E4 zones from investigation areas shown, and concerns that parks and community land will be developed within the investigation area

Third submission

The third submission builds on the preceding two, with additional points including:

- Future housing and population growth in the LGA should be focused on higher land way from the low-lying coastal strip and closer to the CBD and Chatswood
- The Centres Renewal Framework as it applies to Mona Vale and Pittwater is not supported.

Response

The draft LHS is being revised to make clear the intent that current building heights in Mona Vale will be retained. Issues relating to the provision of infrastructure to support housing growth will be addressed through future detailed planning around Mona Vale. The Mona Vale Place Plan will be an important input to the detailed planning phase, as will the Draft Northern Beaches Employment Strategy given the role of Mona Vale as a commercial centre.

The Investigation Area boundaries have been used to visually illustrate the extent of the area being considered for the key centres. There are some sites which will be excluded from consideration for medium density shown within these areas at a later stage of planning, however, these will be excluded from consideration for new housing in the future detailed planning for the centres – with the scale of the images excluding individual sites and small areas that can make the maps more confusing and difficult to comprehend.

As noted in the draft LHS, E4 areas are only proposed to permit secondary dwellings in addition to single dwellings. Notes will be included to highlight that E4, community facilities and other excluded areas are not being considered for medium density housing renewal.

The intention of seeking exemption to the SEPPs as they currently apply is for Council to ensure that special housing forms are delivered in areas where there is appropriate access to transport and services.

DUFFYS FOREST RESIDENT ASSOCIATION

This submission raised concerns that the Draft LHS has not considered actions to allow for granny flats in RU4 zones areas of Duffys Forest and Terrey Hills. It was noted that this issue has been raised with Council previously, but did not progress further due to issues with bushfire evacuation risks and the prospect for the inadvertent subdivision of rural lands. The submission notes that allowing for granny flats could offer affordable housing and retirement/ageing in place options, maintain current subdivision patterns, not impact significantly on infrastructure needs, and align with existing controls in the former Pittwater LGA. An attachment was also provided which detail a Fairfield City Council proposal for secondary dwellings in rural zones.

Response

The potential benefits of secondary dwellings are noted. The draft LHS takes a strategic approach to concentrate new housing around key centres with good transport accessibility and access to services. The draft LHS has not considered rural lands as a primary opportunity for new housing to be developed for this reason.

Council's review of the LEP can consider issues such as this to do with permissible used in areas not focused on in the draft LHS, with due consideration of bushfire and other risks from additional housing being located in inaccessible areas. This should include whether greater housing diversity in rural areas is desirable, including secondary dwellings, and impact on landscape character and limiting the size of dwellings.

NEWPORT RESIDENTS ASSOCIATION

This submission from the Newport Residents Association expressed support for the scope and direction of the Draft LHS, however raises concerns about the application to Newport. It notes the geographic characteristics of the area and existing development patterns which make accessibility more limited. The submission notes:

- The targets set out in the LHS are based on 5-year old ABS data and DPIE projections, noting that many things may have changes since this data was collected
- The radii for increased housing diversity around villages like Newport and Avalon should be limited to 500 metres
- Clarification on the Newport Master Plan, and that no changes will be made to E4 and R2 areas
- The LHS proposed increase densities in areas around future B-Line routes, with concerns around the status of the B-Line extension to Newport and if this would propose increased densities in Newport
- Current issues with parking provision for new developments
- The demand for over 55's living developments is being driven by people from outside the Northern Beaches rather than locals, with concerns around the affordability of many of the seniors living developments delivered
- Concerns that older housing stock in Avalon and Newport will become more expensive due to rezoning, locking out older people in the area trying to downsize.

Response

The draft LHS is not proposing to apply the centres renewal framework to Newport. The reference to the B-Line extension is from a map in the Northern Beaches LSPS which was previously exhibited and endorsed. The LHS approach in general is for more housing density around centres on the B-Line but not all of them – the centres being considered for more substantial renewal are Brookvale, Dee Why, Mona Vale, Manly Vale and Narrabeen. This will be made clear in the text where appropriate.

The review of the LEP will consider any changes required to zoning. However, local centres identified in the LHS, including Newport, are only proposed to allow for dual occupancy typologies. This is intended to allow for some more low-rise housing diversity in the area but not large increases in densities that will disrupt the existing character or encourage speculative development. The LHS shows that E4 zoned areas are only proposed to allow for single and secondary dwellings.

The point regarding the age of the underlying data used is noted. The LHS notes that updates may need to be made with updated population projections in future. There are no other robust and detailed sources of current demographic data available besides the Census – data from the 2021 Census will not be available until at least 2022. Council data has been used to identify dwelling completions since 2016 and to inform the LHS.

AVALON PRESERVATION ASSOCIATION

This submission identified with concerns with changing planning controls to facilitate new development to meet the identified deficit in housing capacity in the draft LHS. Points raised included uncertainty around population projections. It was also suggested that the 1-kilometre area identified around Avalon should be reduced given the geographic constraints of the area. Concerns are also raised around inappropriate seniors housing developments, with support for seeking exemption to the SEPPs. The submission requests that references to the Newport B-Line extension be removed.

Response

Council is considering the appropriate areas for potential medium density housing around the identified centres. The radius for low-rise housing diversity around Avalon has been reduced to 400 metres in the LHS. The draft LHS is a strategic document, and appropriate land uses will be reviewed in more detail through the LEP review. The draft LHS proposes seeking exemption to SEPPs to better target where seniors housing can be located.

The references to the Newport B-Line extension are from an image in the Northern Beaches LSPS – this has not been assumed in the draft LHS.

PITTWATER NATURAL HERITAGE ASSOCIATION

This submission from the Pittwater Natural Heritage Association (PNHA) raises concerns with the potential for the natural environment, particularly tree cover and green space, to be lost on residential loss when housing densities increase. Particular concerns are raised regarding Mona Vale.

Response

The intention of the draft LHS is for detailed planning to be undertaken for Mona Vale to determine where there may be opportunities for housing, while appropriately taking into account the issues raised

in this submission, including environmental effects and impacts. The intention of the draft LHS is to retain natural areas.

CLAREVILLE AND BILGOLA PLATEAU RESIDENTS ASSOCIATION

This submission was provided from the Clareville and Bilgola Plateau Residents Association. The submission notes that the LHS is well-thought out and supports the concentration of increased densities around transport and service nodes. The submission raises concerns that due to COVID the population projections will be out of date, and the need for a considered look at how SAH and boarding houses should be delivered. The submission notes particular concerns with the Avalon centre, including that the existing height limits should be retained and the status of the Avalon Place Plan. Issues are also noted including the need to preserve local character, parking, preservation of existing trees, and issues with spot-rezonings.

Response

The draft LHS does not proposed 4-6 storey heights or large density increases for Avalon. Local centres in the strategy such as Avalon are only proposed to include low-rise housing diversity, and allow for dual occupancy type dwellings, not 4-6 storeys. The area being considered has also been reduced to a 400-metre radius. Detailed considerations around the delivery of SAH will be undertaken in Council's preparation of an affordable housing action plan.

THE PALM AND WHALE BEACH ASSOCIATION

This submission provided by the Palm and Whale Beach Association expresses support for the logic of the LHS, but specific concerns for the Pittwater area and Avalon in particular. The submission includes points around retaining the existing height limits in Avalon, the need to preserve local character, topographic issues, parking issues and accessibility of the peninsula, and issues with spot-rezonings.

Response

The draft LHS does not proposed large density increased for Avalon. Local centres in the strategy such as Avalon are only proposed to include low-rise housing diversity, and allow for dual occupancy type dwellings, not 4-6 storeys. The area being considered has also been reduced to a 400-metre radius. Detailed considerations around the infrastructure requirements will be considered as part of Council's review of development contributions and the LEP.

PITTWATER COMMUNITY ALLIANCE

This submission from the Pittwater Community Alliance (PCA) notes the differences between the Pittwater area and the rest of the LGA in terms of geography and topography, accessibility and its housing character. It is note that the underlying data used in the LHS is from the Census and that population trends may have shifted, particularly with COVID, and therefore there may not be a need to increase housing densities. It also notes that the potential contribution of Ingleside to meeting housing demand has not been included. It requests reducing the reducing the area shown around Avalon and Newport, and questions the B-Line extension to Newport shown in the LSPS map. Issues with infrastructure provision and seniors housing developments are also raised, with support expressed for seeking exemption to the seniors housing SEPP.

Response

The draft LHS acknowledges that population projections will be updated if DPIE provide updated projections, and the LHS may need to be updated in light of this. Advice from DPIE is to continue to plan for the long term and not short term Covid impacts.

The status of and potential future dwellings at Ingleside has only recently been clarified by the NSW Government. The map showing the Newport extension of the B-Line is taken from the LSPS, which was previously exhibited and endorsed and are not considered in the LHS preparation. Increases in densities around Newport and Avalon are likely to be minimal, with only single dwellings, secondary dwellings, and dual occupancies identified for these locations. The area being considered has also been reduced to a 400-metre radius around the centres.

GREATER MANLY RESIDENTS FORUM

This submission provided by the Greater Manly Residents Forum raised concerns that the LHS has not considered elements such as the impact of the Beaches Tunnel on the Manly region, Frenchs Forest plans, that much of the capacity target can be met by current controls so development will not adhere to the objectives of the LHS, and the impact of the potential east-west B-Line. The submission also raises concerns around potential cumulative impacts on infrastructure, and the need to preserve local and heritage character in the Manly area. The submission supports seeking exemptions to the SEPP related to boarding houses.

Response

Many of the issues raised in this submission will be addressed through future detailed planning around centres, and Council's review of the LEP. The draft LHS has taken a focus of concentrating potential new housing around existing centres and to avoid sensitive areas. Manly is not proposed to see significant new development given its heritage constraints and that it is already substantially developed.

FRIENDS OF NARRABEEN LAGOON CATCHMENT

This submission provided by the Friends of Narrabeen Lagoon catchment group supported the approach of the LHS to limit new housing to existing urban areas so that development does not encroach on existing bushland and natural areas. Concerns were raised with some elements of the LHS, including around parking adequacy in relation to boarding houses, and requests that environmental areas are clearly mapped and not considered for development even if close to centres. Specific concerns were raised around the consideration of boarding houses as a form of affordable housing, the need to cater for both nursing homes and more general medium density forms of seniors living, and the need to limit seniors housing in risk-prone areas. Further clarity was also requested around ensuring the protection of natural areas, and issues were noted with developments being approved in inaccessible or inappropriate locations.

Response

The LHS takes an approach of allowing for new housing development to be concentrated around centres with good accessibility, which takes away the need to encroach on existing environmental areas. Future detailed planning around each of the investigation areas will also exclude existing natural areas from consideration for development. The approach of the LHS is also to limit the provision of

boarding and seniors housing to suitable areas with good accessibility to avoid some of the issues raised concerning those housing types.

WARRINGAH URBAN FRINGE ASSOCIATION INCORPORATED

This submission raises concerns that the draft LHS will see existing properties down-zoned and the land value lost to owners. Particular mention is made of the Deferred Area.

Response

The draft LHS is not proposing changes to change to zonings in any of the Deferred Area, with new housing instead being concentrated in key centres. Council's review of the LEP will consider any changes to land zoning.

NON-SMOKERS MOVEMENT OF AUSTRALIA INC

This submission was provided by the Non-Smokers Movement of Australia. Key points raised include:

- Council should maintain the special characteristics of the centres
- New buildings should ensure good ventilation, green roofing where possible, solar and wind power, insulation, natural lighting, ease of access, outdoor clothes drying areas, safe pedestrian entries, water re-cycling systems, and safe and clean air.
- Request that Council declare all homes should be smoke-free.

Response

The future detailed planning around the key centres will consider these issues in detail, including the need for sustainability initiatives and other design features of buildings.

AUSTRALIAN LABOR PARTY (PITTWATER)

This submission was provided by the Narrabeen/Pittwater Branch of the Australian Labor Party. The submission raises concerns about potential housing densities in the Pittwater area and a need for more consultation with the community. The submission agrees that housing diversity is needed, but that there need to be appropriate infrastructure in place to support it. It also notes that COVID will have affected proposed targets and house prices. Suggestions are made for where particular housing types may be best suited in the LGA. Support is expressed for addressing the need for SAH through requiring it as part of new developments, and the principles around the sustainability of housing precincts. Issues with boarding houses are also noted. Suggestions for modest (e.g. 2-storey developments) increased to dwellings around some smaller centres are also made, such as Narrabeena, Narrabeen, Fairlight, Bilgola Plateau.

Response

Detailed implications for infrastructure provision will be addressed through detailed planning in the centre investigation areas. The centres that have been chosen for renewal have been based on their proximity to services and/or transport and status as strategic or local centres. Some modest increases in densities may be appropriate in other locations, however, this will be considered through the LEP

review rather than the draft LHS. The draft LHS notes that revisions may be required with new population data to account for COVID impacts.

PROPERTY COUNCIL OF AUSTRALIA

This submission provided by the Property Council of Australia supports the approach to concentrate future housing close to transport and strategic locations. The submission recommends council maintain its housing targets even in light of COVID-19. The submission suggests planning for additional housing capacity to account for unrealised development potential, and that development feasibility be considered in assumptions. The submission expresses support for Council developing a SEPP 70 affordable housing contributions scheme.

Response

As noted in the draft LHS, with future release of population projections the LHS may need to be revised. The feasibility analysis undertaken for the draft LHS has considered likely impediments to development to provide a realistic assessment of potential development capacity as follows.

- The capacity analysis excludes properties which are unlikely to redevelop in reality due to elements such as small lot sizes, where existing development has a high proportion of GFA, and sites with strata subdivision.
- The feasibility assumptions used are the industry standard for a high level analysis, and are intended to provide good high level estimates.
- The revenue and cost assumptions are based on property sales in each area, and so do reflect local submarkets.
- A sensitivity test on the feasibility analysis was conducted which showed that increasing the required feasibility ratio threshold from 1.25 to 1.5 does not substantially undermine the size of the feasible capacity.
- Most of the feasible capacity is at moderate or high densities (RFB, MDH or shop top housing), and so is more likely to be feasible and to occur than cases where uplift is lower.
- The long-term average rate of housing approvals and completions is similar to or higher than what is needed to meet housing projections, indicating no general lack of feasibility of supply/capacity in the area.
- The State Government plans for Ingleside also have the potential to reduce the gap needing to be addressed across the LGA in the case that the feasible capacity is more limited than anticipated.

CREATIVE PLANNING SOLUTIONS ON BEHALF OF SUNNYFIELD

This submission was prepared by Creative Planning Solutions on behalf of Sunnyfield disability services. The submission notes that Sunnyfield currently manage a number of sites in Allambie Heights. The submission includes points around:

- A suggestion to move beyond demographics to consider the needs of resident groups with complex housing needs such as those with an intellectual disability in addition to seniors housing – including consideration of issues such as security of tenure, affordability, design of housing, and access to support services for people with a disability

- Support for the centres focused planning model to provide housing in well-serviced locations
- The need for commentary on the provision of group homes or SDA housing
- Support for integrated sustainable development at a precinct level as proposed by the LHS
- Clarification around how the proposed exemption to the SEPPs will apply to people living with a disability.

Response

It is agreed that there is a need to consider the specific needs of people with a disability in more detail. This and opportunities to support group homes and specialist disability housing will be considered in more detail through the preparation of a comprehensive affordable housing action plan by Council. The proposed exemption from the SEPP is only intended to ensure that seniors housing is provided in appropriate areas.

ETHOS URBAN ON BEHALF OF SUNNYFIELD DISABILITY SERVICES AND CEREBRAL PALSY ALLIANCE (185-189 ALLAMBIE HEIGHTS ROAD)

This submission was prepared by Ethos Urban on behalf of Sunnyfield and the Cerebral Palsy Alliance. Regarding the Allambie Heights campus, the submission notes master planning processes that have been underway since 2019, and suggests the LHS provide a framework for significant sites to be identified for potential housing growth in future. The case is made for residential development to be included on the site given its proximity to Frenchs Forest, and potential for special housing types to be provided in alignment with the operations of both services.

Response

The Allambie Road site is not within an area identified for housing renewal in the draft LHS, however, it should be noted that areas immediately surrounding Frenchs Forest have not been considered in detail in the LHS as the NSW Government is leading the planning for this centre. Councils review of the LEP should consider appropriate land uses for this site.

PLATINO PROPERTIES (5 SKYLINE PLACE, FRENCHS FOREST)

This submission was provided by Platino Properties, concerning seniors housing in general but particularly a proposal for 5 Skyline Place, Frenchs Forest. The submission commends the draft LHS consideration of a range of housing types, including seniors, but raises concerns with seeking exemption to the seniors SEPP. The submission suggests that Council's local planning policies do not adequately provide for the delivery of seniors housing and housing for people with a disability, and suggests that there is a need to allow for more seniors housing in diverse locations beyond those suggested in the LHS. Two attachments are provided, including analysis of demand for independent living units from MacroPlan.

Response

In seeking exemption from the SEPP, the draft LHS takes the approach of concentrating new seniors housing developments in locations which are appropriate and close to transport and services. Issues have been raised by the community concerning the provision of developments under the SEPP in the past. As noted in the LHS, planning for the Frenchs Forest precinct is being led by the NSW Government,

and as such has not been considered in detail. Planning in Frenchs Forest will also need to account for the objectives of the Draft Northern Beaches Employment Strategy and Frenchs Forest as a commercial centre, and GSC and District Plan directions to retain industrial and urban services land.

MACROPLAN HOLDINGS

A submission was provided by MacroPlan Holdings. This raised concerns that the draft LHS has not adequately addressed:

- COVID and current trends on dwelling supply projections
- Using planning control changes to ease price pressures is reliant on Frenchs Forest supply in the short term
- Implications of Clause 4.5A of the Pittwater LEP for Mona Vale's development capacity
- That the Centres Renewal Framework will change the character of existing strategic centres.

Response

The draft LHS notes that future population projections, when released by DPIE, may see updates to the strategy. It should be noted that DPIE advice is to plan for the long term.

While it is acknowledged that the time taken to plan for centres and rezoning places limitations on additional capacity in the planning framework, it is important that detailed planning is undertaken to ensure that sufficient infrastructure is in place to support housing growth. Detailed consideration of planning controls, such as those around Mona Vale, will be considered in the future detailed planning phase and LEP review.

SJB PLANNING ON BEHALF OF THE HENROTH GROUP

This submission was provided by SJB Planning on behalf of The Henroth Group, the owners of land at 6 Jacksons Road and 10-12 Boondah Road, Warriewood. The submission puts forward rationale for the Boondah Road site to be considered as a location for future housing, and concerns with Warriewood not being considered as an area for renewal.

Response

The approach of the draft LHS is for new housing to be concentrated in close proximity to key centres with access to transport and services. While Warriewood has these characteristics, there are also potential issues with flooding and environmental constraints that mean that substantial new development is not possible. Warriewood has instead been identified as a location for low-medium density housing. As the submission notes, this specific site has been the subject of a rezoning review separate from the draft LHS. Changes to zoning will be addressed through Council's LEP review.

TOGA AND CAPITOL INVESTMENT PTY LTD (1-3 RODBOROUGH ROAD, FRENCHS FOREST)

This submission was provided regarding land at 1-3 Rodborough Road, Frenchs Forest. The submission raises issues with the history of previous and current planning for the Frenchs Forest area and plans for the Forest High School site. The submission supports the logic and approach of the LHS, but suggests

that centres outside of the existing B-Line like Frenchs Forest should also be considered suitable for housing.

Response

As acknowledged in the submission, the draft LHS has not considered the Frenchs Forest area in detail, and the NSW Government is leading the planning for this area as a planned precinct. Areas around Frenchs Forest may be suitable for investigation for housing in future, subject to the east-west B-Line. Planning in Frenchs Forest will also need to account for the objectives of the Draft Northern Beaches Employment Strategy and Frenchs Forest as a commercial centre, and GSC and District Plan directions to retain industrial and urban services land.

URBIS ON BEHALF OF LIF PTY LTD (ALLAMBIE GROVE BUSINESS PARK)

This submission was prepared by Urbis on behalf of the owners of the Allambie Grove Business Park (25 Frenchs Forest Road East). The submission notes three primary issues:

- The LHS dwelling demand underestimates future demand – with an estimate from Urbis of a gap of 7,000 dwellings (projection for 15,386 additional dwellings to 2036)
- That insufficient land is zoned to meet this demand
- Review of the LHS is required to confirm realistic housing demand in the LGA.

The submission asserts that Allambie Grove Business Park site could be used to help address the gap in housing capacity. An attachment of Urbis's analysis of potential housing demand was also provided.

Response

Population projections have not been developed separately for the draft LHS. All forecasts used in determining future housing demand in the draft LHS have been based on DPIE's forecasts for the Northern Beaches, updated to reflect dwellings that have been delivered in the LGA since 2016. It is acknowledged in the LHS that COVID will impact on the future demand for housing, and the LHS may be updated to reflect population and housing forecasts when they are released by DPIE. Note DPIE response elsewhere.

Regarding the feasibility and capacity analysis, the following explains the approach taken to inform the Draft LHS – noting that the detail of the assumptions used to calculate the capacity and feasibility were not put on exhibition:

- The capacity analysis excludes properties which are unlikely to redevelop in reality due to elements such as small lot sizes, where existing development has a high proportion of GFA, and sites with strata subdivision.
- The feasibility assumptions used are the industry standard for a high level analysis, and are intended to provide good high level estimates.
- The revenue and cost assumptions are based on property sales in each area, and so do reflect local submarkets.
- A sensitivity test on the feasibility analysis was conducted which showed that increasing the required feasibility ratio threshold from 1.25 to 1.5 does not substantially undermine the size of the feasible capacity.

- Most of the feasible capacity is at moderate or high densities (RFB, MDH or shop top housing), and so is more likely to be feasible and to occur than cases where uplift is lower.
- The long-term average rate of housing approvals and completions is similar to or higher than what is needed to meet housing projections, indicating no general lack of feasibility of supply/capacity in the area.
- The State Government plans for Ingleside also have the potential to reduce the gap needing to be addressed across the LGA in the case that the feasible capacity is more limited than anticipated.

Regarding the Allambie Business Park site:

- The LHS does not advocate for housing being developed in existing employment areas. Planning for this specific site will need to consider the Draft Northern Beaches Employment Strategy as well as the NSW Government's planning for Frenchs Forest.
- The GSC's District Plan includes directions to retain existing industrial and urban services land, which can include B7 zoned land such as the Business Park site. Allowing for residential uses in this location is therefore potentially inconsistent with this aim.

URBIS ON BEHALF OF MANLY LEAGUES CLUB

This submission, prepared by Urbis on behalf of the Manly Leagues Club, raised concerns with the approach of LHS to concentrate future renewal around Brookvale within a 1-kilometre radius of the centre, without considering the potential for sites in north Brookvale. The submission concerned a particular site owned by the Manly Leagues Club, and the potential for this to be developed for mixed uses and contribute to a linear Dee Why-Brookvale centre. The submission suggests that there may be more limited housing potential in the LGA than identified in the Draft LHS, and additional information around assumptions used in the analysis was requested.

Other submissions were provided from businesses including **Premier Fitness** and **In2Swim** that put forward the suggestion that new housing on the Leagues Club site is needed to revitalise the area. An additional submission was also provided by Manly Leagues Club directly.

Response

As outlined in the Draft LHS, there will be detailed future planning undertaken for Brookvale, which will be heavily influenced by the Brookvale Structure Plan and Northern Beaches Employment Strategy being prepared by Council.

Brookvale is a unique place and does not necessarily act as a traditional centre. There is little evidence that there is an economic decline in the area that would justify the need for renewal of the B5 area along Pittwater Road based on new housing.

Allowing for mixed use development out of the immediate catchment of centres has the potential to undermine the strategic approach of the Draft LHS (that is, to concentrate housing in accessible locations around centres with good amenity) and the aims of the Northern Beaches Employment Strategy. New residential development in the B5 zone creates potential issues for the industrial character of the area, and the directions from the Greater Sydney Commission (GSC) that industrial and urban services land (including B5 zoned land) be retained in the North District.

Individual proposals in Brookvale will need to be carefully considered by Council in relation to the objectives of the Draft LHS as well as the Brookvale Structure Plan and Northern Beaches Employment Strategy.

Regarding the feasibility analysis and whether the Draft LHS is overestimating housing capacity, the following explains the approach taken to inform the Draft LHS – noting that the detail of the assumptions used to calculate the capacity and feasibility were not put on exhibition:

- The capacity analysis excludes properties which are unlikely to redevelop in reality due to elements such as small lot sizes, where existing development has a high proportion of GFA, and sites with strata subdivision.
- The feasibility assumptions used are the industry standard for a high level analysis, and are intended to provide good high level estimates.
- The revenue and cost assumptions are based on property sales in each area, and so do reflect local submarkets.
- A sensitivity test on the feasibility analysis was conducted which showed that increasing the required feasibility ratio threshold from 1.25 to 1.5 does not substantially undermine the size of the feasible capacity.
- Most of the feasible capacity is at moderate or high densities (RFB, MDH or shop top housing), and so is more likely to be feasible and to occur than cases where uplift is lower.
- The long-term average rate of housing approvals and completions is similar to or higher than what is needed to meet housing projections, indicating no general lack of feasibility of supply/capacity in the area.
- The State Government plans for Ingleside also have the potential to reduce the gap needing to be addressed across the LGA in the case that the feasible capacity is more limited than anticipated.

URBIS ON BEHALF OF DEE WHY RSL

This submission was prepared by Urbis on behalf of the owners of the Dee Why RSL Club on Pittwater Road. The submission outlines the future of aspirations of the Club's owners for the land, including to introduce seniors housing and a hotel development, and how these plans may align with the aims of the draft LHS. The submission argues that additional height above the controls in place may be needed to support the proposed seniors development. Clarification is sought as to the timing for any zoning changes from the draft LHS to be implemented.

Response

Changes to any building height or other controls in Dee Why and its surrounds will be addressed through detailed centres planning that will be undertaken within the next five years by Council. While providing seniors housing in accessible locations aligns with the draft LHS objectives, the merits of this particular proposal will be assessed by Council through Planning Proposal and Development Application processes.

BBF TOWN PLANNERS ON BEHALF OF OWNERS OF 65-67 VETERANS PDE, COLLAROY PLATEAU

This submission was prepared by BBF Town Planners on behalf of owners of land at 65-67 Veterans Parade, Collaroy Plateau. The submission requests that this site and other smaller centres to be identified in the LHS for increased building height, to support redevelopment.

Response

The LHS does not support increase densities in smaller centres such as Collaroy Plateau, instead concentrating growth in key centres around transport and other services. In this instance, the centre is not on a major transport route.

WILLOWTREE PLANNING ON BEHALF OF EG (100 SOUTH CREEK ROAD, CROMER)

This submission was prepared by Willowtree Planning behalf of EG, regarding a site at 100 South Creek Road, Cromer. The submission expresses support for the strategy approach to housing in the Draft LHS, but provides additional suggestions, including to:

- Update the LHS to allow for 'sensitive' residential development (such as the missing middle) on part of the identified site
- Recognise opportunities for residential uses on sites deemed unsuitable for other uses such as industrial, which may include sites greater than 1 or 2 hectares in area, located within within 800-2km of a strategic centre, situated along a collector road, within a walkable distance to bus services providing connection to the nearest town centre, location on the fringe of employment precincts, where site constraints that preclude development for industrial purposes, where sufficient land area can accommodate residential or other sensitive land uses whilst also maintaining a suitable separation buffer to safeguard residential amenity and allow for uncompromised industrial operations, and no 'genuine' loss of industrial or urban services land on the basis that the site cannot be developed for employment-generating development.
- Increasing the radii around centres to 800 metres to 2 kilometres, in line with Transport for NSW suggestions, or adopt a merit-based approach to proposed for missing middle housing.

Response

In summary, the suggestions for the LHS outlined in this submission, primarily to support residential development at 100 South Creek Road Cromer, is not supported by the strategic approach adopted in the LHS nor the GSC's strategic policies.

- The LHS has been based on concentrating new housing around key centres – Cromer is not identified as a strategic or local centre in Council or State Government planning documents. The LHS approach is intended to limit the negative outcomes that can result from spot rezonings.
- While the LSPS shows a 2-kilometre radius for potential housing opportunities, the LHS has refined this approach to focus on areas that are within a typical walkable distance, to 800 metres from the centre investigation centres. The Cromer site is outside of this distance from the Dee Why centre.
- As acknowledged in the submission, the GSC's District Plan requires for industrial and urban services land to be retained in the Northern Beaches LGA. The site is currently zoned for industrial uses – as such, allowing for residential development in this location would be inconsistent with the District Plan. Allowing for residential uses in this location would also have flow on impacts for the

other industrial uses in the Cromer precinct including the potential to introduce land use conflicts. The future of employment precincts is also being considered in the Draft Employment Strategy.

KEYLAN CONSULTING ON BEHALF OF CATHOLIC ARCHDIOCESE OF SYDNEY

This submission was prepared by Keylan Consulting on behalf of the Catholic Archdiocese of Sydney, the owners of land at Lady Penrhyn Drive, Beacon Hill, within the Deferred Matter area. The submission outlines plans to develop the site, and includes arguments for facilitating more low density housing types in the LGA outside of Warriewood and Ingleside. The submission requests the removal of the mapped constraint areas in the LHS, particularly concerning the Deferred Matter area.

Response

The LHS provides a strategic framework for the development of new housing in the LGA to meet future demand. The approach of the LHS is to concentrate future housing development in key centres which have access to transport and services, rather than continued low density development, with a focus on preventing the encroachment of housing development into existing natural areas – such as those identified as Significant Constraints. As such, development in the Deferred Matter areas have not been considered. As noted in the submission, the future of this area is being addressed by Council separately.

While there may be demand for new detached housing, the environmental constraints of the LGS will limit this potential. Demand from families can also be met by medium density housing forms.

URBAN TASKFORCE

This submission from the Urban Taskforce welcomes the draft LHS in its articulation of housing targets, shortfall in capacity, and strategy to meet said shortfall. The submission raises objections to considerations of local character, arguing that there is a need for more housing to plan for longer term which character considerations may prevent. Concerns are also raised with the levying of affordable housing contributions in general, arguing that rezoning and more housing delivery can address affordability issues more effectively.

Response

As outlined in the draft LHS, there is a need to balance the need for new housing with existing constraints and the character of the Northern Beaches to ensure that the LGA remains liveable to its residents. As also outlined in the draft LHS, the LGA has a significant backlog in demand for social and affordable housing, which has not been addressed by the market despite significant development seen in the LGA in recent years. Without mechanisms to ensure that new development contributes to addressing affordable housing need, new SAH stock will not be delivered, with broader consequences for the community. There is no evidence that simply delivering more housing (without consideration of affordability) does anything to improve housing affordability. The introduction of an affordable housing contribution is supported to increase dedicated supply of SAH for low- and moderate-income households.

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