

Attachment 2: LSPS – summary of submissions and proposed Council response.

	Submitter	Submission Summary	Council response
1.	NSW Aboriginal Land Council	<p>LALCs are often significant land holders within a local government area and as such, ensuring that the visions and plans in your LSPS include LALC land will understandably contribute to the long-term success of your LSPS.</p> <p>We note the <i>Example LSPS</i> prepared by the NSW Department of Planning includes the following key goals and actions for Local Councils to work in partnership with LALCs to:</p> <ul style="list-style-type: none"> • Promote tourism, • Enhance the economic self-determination of Aboriginal communities through their land holdings, and • Protect and celebrate Aboriginal culture and heritage. <p>We encourage you use the above goals, and similar actions and priorities as set out in District Plans, as a starting point for discussions with LALC(s) in your boundary. We promote a co-design approach to developing goals and priorities appropriate to local circumstances.</p>	<p>Noted.</p> <p>The Metropolitan Local Aboriginal Land Council (MLALC) has been consulted and the LSPS drafted with the NSW ALC comments in mind.</p> <p>Further amendments are proposed for the final LSPS following comments by the Aboriginal Heritage Office (submission 15).</p>
2.	Resident, Willoughby South	<p>View expressed to ensure the best result for the future of Willoughby so that our area is refreshed and rejuvenated. Strongly support the proposed concept and planning that provides for increased FSR and Height controls with amalgamated sites in Willoughby South local centre.</p> <p>The key recommendations for Willoughby South should be adopted in order to activate increased housing and improved Local Centres:</p> <ol style="list-style-type: none"> 1) FSR controls to be 3:1 for amalgamated sites, with a minimum FSR for isolated sites at 2.5:1 2) Height controls must reflect 6 storeys as a minimum 3) A Supermarket at ground level 4) Activated laneway connections. <p>Support for the recommendations above to be adopted in the final planning documents as without them being gazetted the area will remain as it is in its stale state.</p>	<p>Noted.</p> <p>Council has undertaken extensive consultation regarding the Willoughby Local Centres strategy.</p> <p>The endorsed Local Centres Strategy for Willoughby South limits heights to 4-5 storeys on Willoughby Rd and 2:1 floor space ratio.</p> <p>3:1 FSR is supported for amalgamated sites with a frontage on the eastern side of Willoughby Rd, to incentivise the delivery of additional commercial floor space, public plaza and supermarket. A minimum non-residential FSR of 1.5:1 would apply.</p>

3.	Community member	<p>Strong support for the Willoughby South Plan for a Plaza and additional height. It will encourage activation and provide a great area for the entire community.</p> <p>Please ensure the following recommendations are adopted.</p> <ol style="list-style-type: none"> 1) FSR controls to be 3:1 for amalgamated sites, with a minimum FSR for isolated sites at 2.5:1 2) Height controls must reflect 6 storeys as a minimum 3) A Supermarket at ground level 4) Activated laneway connections. 	Noted – comments as above.
4.	Kat Horton Vice-President Australian Slacklining Association Inc.	<p>The Australian Slacklining Association Inc. is the preeminent representative body for slacklining in Australia. We aim to support and develop the slackline community and protect land access rights for all forms of slacklining in Australia. The Association strives to legitimise the slacklining community as valid stakeholders in plans impacting outdoor recreational spaces.</p> <p>It is recommended that a priority be included to support a variety of recreational and passive uses that reflect the changing needs of the community when planning for existing and new open space.</p>	<p>Noted. Slacklining can be done in parks, street verges and wherever trees are suitable. Their activity does not need any built infrastructure.</p> <p>The recommendation is being addressed within the Council's Open Space and Recreation Plan and no change is considered necessary for the LSPS.</p>
5.	Community member Chatswood	<p>Under other recent studies on p15; namely the Chatswood CBD Planning and Urban Design Strategy to 2036 – there is no mention of future provision for climate change adaptation. This must surely feature somewhere in the objectives appearing in the right-hand column. I suggest editing the dot-point “A city form and scale to accommodate future growth and adapted to mitigate the ravages of climate change.</p> <p>Under Plan Summary Themes, pp 17-19; no mention of provision for adapting the city to mitigate the ravages of climate change – e.g., rising sea-level, riverine tidal changes, water shortages, energy rationing, longer hotter summers. An additional Serial under Theme 3 which picks up this LSPS imperative is suggested.</p>	<p>Noted. The LSPS contains a number of actions addressing resilience and climate change under Priority 16. Climate change resilience is specifically addressed in the Our Green City Plan (OGCP).</p> <p>In the LSPS it states Council will:</p> <ul style="list-style-type: none"> • <i>Reduce energy, water and resource waste and encourage reuse and recycling (P.16)</i> <p>Resilience to climate change is listed under resilient city with participation in Resilient Sydney as a means of building resilience to climate change.</p> <p>Chatswood CBD Planning and Urban Design Strategy to 2036 is an adopted Strategy and incorporates sustainability initiatives.</p>

6.	NSW Office of Sport	<p>The Office of Sport supports the draft LSPS. The Office notes and supports the following LSPS actions:</p> <p>Page 19 -Augmenting local infrastructure and using existing infrastructure more efficiently to accommodate planned sporting and community demand.</p> <p>Page 58 -Priority 17 -Actions : Regularly review the development contributions plan to ensure that service standards in the LGA will be maintained as the population grows. Require major development to share any value uplift from changes in development rights to deliver a community benefit through improved local infrastructure.</p> <p>Page 59 -Priority 18 -Actions Work with the NSW Government to put infrastructure contributions in place to fund required major infrastructure upgrades. Continue to advocate for public transport projects by the NSW Government and other necessary major infrastructure investment, including potential eastern public transport routes, an upgrade of the Chatswood Bus Interchange, and contributions towards additional district level recreation and sports facilities.</p> <p>Page 60 -Priority 19 -Actions Continue to pursue joint use arrangements, including with the NSW Department of Education, to maximise the availability of open space and social infrastructure to the growing population.</p> <p>The office is currently preparing District Sport Infrastructure Plans as identified by the GSC in the District Plans. The Office recommends the following additions and amendments to LSPS.</p> <ul style="list-style-type: none"> • Council consider including an additional action in the LSPS to support and assist in the implementation of the District Sport Infrastructure Plans (once released). • Page 58 -Priority 17 -Actions -Amend Maintain current service levels of social and physical sport and active recreational 	<p>Comments noted.</p> <p>Proposed amendments and additions agreed and have been included in revised LSPS.</p> <p>These changes are:</p> <ul style="list-style-type: none"> • Council consider including an additional action in the LSPS to support and assist in the implementation of the District Sport Infrastructure Plans (once released). • Page 58 -Priority 17 - Actions -Amend Maintain current service levels of social and physical sport and active recreational infrastructure so that liveability does not decrease as development occurs. • Page 60 -Priority 19 - Actions -Add Work with North District councils, stakeholder groups and NSROC regarding the findings of the NSROC's Regional Sportsground Strategy Review Report (2018) in order to plan for sporting infrastructure provision on a district basis.
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		<p>infrastructure so that liveability does not decrease as development occurs.</p> <ul style="list-style-type: none"> Page 60 -Priority 19 -Actions -Add Work with North District councils, stakeholder groups and NSROC regarding the findings of the NSROC's Regional Sportsground Strategy Review Report (2018) in order to plan for sporting infrastructure provision on a district basis. <p>The Office welcomes the opportunity to share these insights to help deliver LSPS actions including open space studies and strategies, and other placed based actions such as the review of the Willoughby City Council Open Space & Recreation Plan 2013.</p>	
7.	Dr Meredith Foley Hon. Secretary, Willoughby Environmental Protection Association Inc	The Willoughby Environmental Protection Association (WEPA) has provided a detailed submission on the LSPS. A copy of the submission and Council's response to each point is attached.	See attached submission response.
8.	Transport for NSW	See attached submission response.	See attached submission response.
9.	Create NSW	<p>Create NSW is responsible for furthering the Government's vision for NSW to be known for its bold and exciting arts and culture that engages the community, supports innovation, facilitates economic development, and reflects the state's rich diversity.</p> <p>Inclusion of cultural objectives in the LSPS is a first step to integrating cultural activity and infrastructure into local planning processes for people of Willoughby.</p> <p>We encourage you to think about including the following elements in the final document:</p> <ul style="list-style-type: none"> Relationship with the local Aboriginal community Existing cultural infrastructure (<i>The NSW Cultural Infrastructure Plan 2025+ (2019)</i> provides a framework for planning and delivery of cultural infrastructure across NSW) Cultural diversity within Willoughby The benefits of art and culture to a successful night-time economy The existence or potential of cultural 	<p>Comments noted.</p> <p>Amendment to the vision made to include reference to "arts and culture" in the LSPS vision to strengthen reference to this sector.</p> <p>Further information has been included in the revised LSPS relating to cultural diversity, arts and culture initiatives and tourism opportunities in the Willoughby LGA.</p> <p>All the points in the submission are noted and will be considered as part of the preparation of the Willoughby Cultural Plan.</p>

		<p>industries in your area</p> <ul style="list-style-type: none"> • Existing and future public art projects • Joint-use opportunities • Tourism opportunities • The impact of arts and culture to successful place making • The benefit of access to arts and culture for the health and wellbeing of your residents, paying consideration to access by people with disabilities, seniors and children and young people. <p>Willoughby City Council LSPS could benefit from making strong references to the role of arts and culture in its high-level vision statement. While the LSPS demonstrates a strong understanding and celebration of Willoughby’s Aboriginal history and contemporary cultural expression, as well as a desire to diversify the economy to include creative industries, we believe there are other opportunities where arts and culture can have a positive impact. In particular:</p> <p><i>Priority 4 – Ensuring that social infrastructure caters to the population’s changing needs and is accessible to foster healthy and socially connected communities.</i></p> <p>Council may wish you to provide greater detail of your plans for cultural infrastructure as you have done with other social infrastructure such as schools and open space and recreation facilities.</p> <p><i>Community Priority 4.2 – Build and support a night-time economy.</i></p> <p>Council is encouraged to consider the benefits of arts and culture, including festivals, live music and public art, to the night-time economy.</p> <p><i>Priority 5 – Respecting and enhancing heritage and local suburban character.</i> Arts and culture play an important role in helping to retain and enhance the unique identity of a place, fostering a strong sense of place and instil community pride.</p> <p><i>Priority 9 - Developing Chatswood CBD as a key commercial centre and integral part of the Eastern Economic Corridor.</i> Create NSW can provide advice to assist you in promoting an arts and culture cluster around the Concourse.</p> <p><i>Priority 19 – Working with other organisations to provide require infrastructure.</i></p> <p>The LSPS refers to shared used of sporting</p>	
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10.	Resident	<p>1. Reliance on medium density housing for growth is unrealistic. Presumably medium density means dual occupancy and townhouses. It would be a rare site in the LGA that would be viable for such conversion. House prices are so high that conversion from single houses to 3-4 storey apartments is the realistic growth pattern. The best way for the community to benefit is for a strategy to be in place nominating appropriate areas and encouraging Planning Proposals that have a chance of succeeding providing they provide a significant public benefit by contributing to affordable housing, local infrastructure and the green grid.</p> <p>2. Affordable housing target of 52 units by 2036 is miserable.</p> <p>3. Cycling target is too general - it must be prioritised within 1km of each school and 2km of the Chatswood Centre- safe separated cycle ways</p> <p>4. Local centres, R3 and R4 zones should increase substantially in density and area to really contribute to growth accommodation and enabling people to remain in their communities as they downsize</p> <p>5. Chatswood Centre as a focus for jobs is strongly supported</p> <p>6. No loss of industrial land may be too stringent pending a study. For example East Chatswood industrial area has a natural drainage line to Scott's Creek that should be protected and enhanced as part of the metro green grid - industrial use is a poor environmental neighbour - a careful study of better uses interfacing green corridors is needed.</p> <p>7. St Leonard's Centre and Crows Nest Centre should be in the one LGA - probably North</p>	<p>1 and 2. The draft LSPS outlines Council policy to promote medium density housing particularly in Local centres and increase the affordable housing component of new developments. This is proposed to increase from 4% gross floor area (GFA) to 7% GFA by 2021 and to 10% by 2026.</p> <p>3. As stated in Council's LSPS, Willoughby's existing open spaces and landscape corridors provide north-south environmental connectivity around Middle Harbour and the Lane Cove River, and the beginnings of east-west connectivity along creek corridors from bushland to the nearby parts of suburbs. To improve this connectivity, east-west green walking and cycling corridors will be provided, creating continuous routes from the river and waterways in the west to the inlets and peninsulas of Middle harbour in the east via Willoughby's commercial centres and the housing diversity area. These actions, accompanied by the recommendations outlined in the Willoughby Bike Plan, specifically provide a target of providing connections to the areas and increasing cycle use along the prescribed routes.</p> <p>While specific usage targets have not been set, priority projects incorporating safe separated cycleways were identified in the 2017 review of Council's Bike Plan and these</p>

		<p>Sydney!</p> <p>8. Waterway health should be improved - no net decline is not good enough.</p> <p>9. Bushland biodiversity should be improved by better management and weed maintenance.</p> <p>10. Waste diversion target from landfill is impressive.</p> <p>11. Local infrastructure contributions methodology for Planning Proposals should be provided.</p> <p>12. Chatswood bus interchange needs major improvement though a site specific strategic plan for the site and adjoining lands where increased development potential enables the new expanded bus interchange mainly under new development.</p> <p>Additional items:</p> <p>13. The Willoughby Leisure Centre needs to be expanded and the pool deepened.</p> <p>14. The Castle Cove Pool needs to be rebuilt and expanded.</p> <p>15. The area between Chatswood Centre and Penshurst Rd at two street blocks either side of Victoria Rd needs to be planned for higher density residential (and a separated cycle way along the length of Victoria Rd) given the level walkable access of this area to the Chatswood Centre and station.</p> <p>In conclusion, apart from the tree canopy target, the LSPS is very much the status quo and not visionary let alone strategic.</p>	<p>reflect the Priority 3 objectives as highlighted in LSPS.</p> <p>4. The <i>Local Centres Strategy</i> is proposing greater densities in the majority of local centres. Under the <i>Housing Strategy</i> it is also proposed to maximise development within existing R3 and R4 zones.</p> <p>5. Noted.</p> <p>6. Noted. Industrial lands review to be undertaken as a priority in 2020.</p> <p>7. Comment noted.</p> <p>8. The statement relating to waterway health is from '<i>Our Green City Plan 2028</i>' which was endorsed by Council following public exhibition and consideration of community feedback.</p> <p>The statement 'no reduction in water quality' is a minimum requirement. Council is increasing investment in catchment management including an improved response to water quality incidences to address water quality issues in Willoughby LGA.</p> <p>9. Enhancing Willoughby's biodiversity is addressed in the following actions stated in the LSPS: "Continue to review and implement the Willoughby Council Urban Bushland Plan of Management to maintain biodiversity and maximise the value of bushland as part of the natural heritage of Willoughby.</p> <p>Protect high value ecosystems in the private domain through planning controls to enhance biodiversity and protect environmental values."</p> <p>Bushland management and</p>
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11.	Development and Transactions NSW Health & Development & Transport (part of Housing and Property, DPIE)	Development and Transactions and NSW Health has reviewed the LSPS and provides 'in-principle' support for the following, relevant priorities and actions: Priority 2: Increase the supply of affordable housing. Given the rising cost of living affecting housing	<p>Comments noted. Council is committed to play its part in achieving a greater supply of affordable housing in Willoughby LGA.</p> <p>Comments noted regarding the</p>

		<p>affordability, we note the need for both Council and Government to provide opportunities for affordable housing to allow key workers to access the RNSH campus as a place of employment.</p> <p>Priority 11: Support for St Leonards to develop as a commercial and health and education precinct.</p> <p>Support for Council's position that Government-owned land within the State Significant 'health and education cluster', has significant scope for job intensification.</p> <p>The southern precinct of RNSH provides the opportunity to focus on synergies with health and education uses, as well as related complementary uses, in line with the site's proximity to St Leonards Station.</p> <p>Overall, there is a strong need for a coordinated, collaborative and holistic approach to future development within the RNSH campus. This will ensure alignment with key strategic directions, engagement with relevant stakeholders and proper consideration of the opportunities to further 'cement' RNSH as a leading health and education precinct.</p> <p>Priority 20: Co-ordinating economic development for Chatswood and St Leonards.</p> <p>Support expressed for a coordinated, inter-Government agency approach to planning and development in the St Leonards Health and Education Precinct.</p> <p>As part of future planning for the southern precinct of RNSH, and the broader St Leonards Health and Education Precinct, NSW Health and Development and Transactions welcome the opportunity to consult and engage with Council and other relevant Government stakeholders.</p>	<p>St Leonards health and education precinct.</p>
12.	<p>Large Format Retail Association</p> <p>(Submitted by Urbis on behalf of the Association)</p>	<p>The Large Format Retail Association (LFRA) welcomes the release of the Willoughby Local Strategic Planning Statement. Members of the LFRA have approximately 30 stores comprising 50,000 m2 of Large Format Retail floorspace within Willoughby LGA. We acknowledge this strategy as a positive step towards the realisation of much needed coordinated local planning reform with regards to the retail sector.</p>	<p>Comments noted.</p> <p>Specialised retail premises are currently permitted in the B3 Commercial Core, B4 Mixed-use and B5 Business Development zones in the Willoughby LEP 2012. Other retail uses are also permitted in these zones.</p> <p>In order to preserve industrial</p>

		<p>Willoughby LSPS has recognised the importance of the retail sector within the LGA, noting specifically the need for large format retail to be preserved within the Artarmon and East Chatswood industrial lands as a vital urban services provider. Importantly, Large Format Retail has been recognised as a key contributor to the retail sector. The LSPS specifically identifies Large Format Retail and its role in supporting the Lower North Shore in <i>Priority 10: Protecting the role of Willoughby's industrial lands as urban service hubs for the Lower North Shore</i>.</p> <p>In addition to the identified areas to be preserved, we recommend Council consider the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Specialised retail incorporated into mixed use developments should be considered outside of industrial zoned land to ensure flexibility and to allow land use planning to appropriately respond to market forces. <input type="checkbox"/> The inclusion of '<i>Specialised Retail Premises</i>' use should be permissible in a range of land use zones to provide further flexibility. <input type="checkbox"/> Where '<i>Specialised Retail Premises</i>' are permissible, consideration of complimentary and ancillary uses such as shops limited in area or business premises should be permissible with consent. <p>The LFRA recommends that Council consider underpinning the demand for this sector in their land use planning framework to avoid ad hoc Planning Proposals. This can be achieved by incorporating more flexibility into the LEP and including specialised retail premises as a permissible land use within a wider range of appropriate land use zones.</p> <p>The LFRA supports Council's assessment and strategy for the large format retail sector and commends Council for recognising the importance of this sector in the preparation of the LSPS.</p> <p>LFRA can assist Council in the preparation of any '<i>Specialised Retail</i>' studies and look forward to working collaboratively with Council to ensure that the needs of the large format retail</p>	<p>areas for industrial and urban services retail uses will be carefully managed. These matters will be further considered as part of the Industrial Lands Strategy and comprehensive LEP review to be undertaken in 2020. Further community and industry consultation will be undertaken at this time.</p> <p>The offer of future assistance by LFRA in undertaking retail studies is noted.</p>
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		sector are accommodated within the planning framework for Willoughby LGA.	
13.	Cancer Council NSW NSW Skin Cancer Prevention Strategy Shade Working Group	<p>As part of the delivery of the Strategy, the Shade Working Group is committed to increasing shade across NSW for skin cancer prevention by influencing the planning system and advocating for shade in the local community.</p> <p>This submission is being provided by Cancer Council NSW, which is Chair of the <i>NSW Skin Cancer Prevention Strategy Shade Working Group</i>.</p> <p>Willoughby Council can play an important role in reducing the risk of skin cancer of its residents through planning and designing shade. Good quality shade can reduce UV exposure by up to 75 per cent.</p> <p>Cancer Council NSW commend Willoughby Council for the inclusion of protecting bushland and biodiversity, and the increase of tree canopy as a local planning priorities in the Draft LSPS. Suggestions provided to ensure the value of shade for UV radiation protection and other co-benefits are fully recognised in the 20 year vision for the LGA.</p> <p>Example text developed to include in LSPS which supports shade as a planning priority for the LGA. It is recommended that Willoughby Council look to include all or part of this text under 'A Sustainable City' (Priorities 13 or 14).</p>	<p>Comments noted.</p> <p>Specific example LSPS provisions provided and noted. It is considered that current LSPS actions relating to increasing urban tree canopy and good urban design will provide adequate overall direction in Council's LSPS in relation to shade.</p> <p>Proposed DCP provisions relating to shade that may apply at the development stage are to be considered as part of the DCP review.</p>
14.	Resident, Chatswood	<p>Submitter feels strongly about the inclusion of sufficient affordable housing in the Willoughby LGA. The impact of not providing sufficient affordable housing for low to middle income earners means that individuals and families are more likely to experience financial stress, and the flow on effects of relationship strain and mental health issues, which place further burden on healthcare and community services in the Willoughby Council area.</p> <p>More affordable housing in the Willoughby LGA would mean we, as a community, are providing stability and hope for young people and families, who would otherwise be forced to live with uncertainty, limited accommodation</p>	<p>The Draft LSPS makes the following recommendation in relation to affordable housing:</p> <p>"Consistent with directions in the District Plan, Willoughby City Council will increase the affordable housing component of new developments from 4% gross floor area (GFA) to 7% GFA by 2021 and to 10% by 2026. Other increases in the amount of affordable housing may also be achieved through the use of planning agreements. This would have the aim of increasing the proportion of all dwellings in the</p>

		<p>choices and additional financial pressures.</p> <p>Given strong community expectation in the area of affordable housing, submitter would like to see the inclusion of an explicit numerical target for affordable housing accessible for low to moderate income residents and see the language strengthened in support of affordable housing throughout both the LSPS and the LHS.</p> <p>The statements and actions in the Willoughby Council Local Strategic Planning Statement (LSPS) related to provision of affordable housing are strongly supported.</p> <p>While the statements and actions are supported, submitter would like to see language strengthened and specified. This includes stating a commitment to a target for affordable housing of at least 15% of total floor space of new developments, preferably delivered on-site.</p> <p>In relation to the Local Housing Strategy (LHS) the following comments were made:</p> <p>Support the overall vision for the inclusion of affordable housing and diversity of housing types.</p> <p>Would like to see the inclusion of an explicit numerical target for affordable housing accessible for low to moderate income residents – preferably 10-15% delivered on-site – and see the language strengthened in support of affordable housing throughout the document.</p>	<p>LGA which are affordable.</p> <p>Council will continue to advocate for state government to invest in social and affordable housing to supplement the dwellings generated by the above contributions.”</p> <p>The following statement has also been included (Priority 2):</p> <p>“Council is committed to maintain its community housing program in future.”</p> <p>It is noted that feasibility would need to be undertaken in relation to the 15% affordable housing target. The LSPS increase for the current 4% target in identified zones is congruent with the North District Plan, a staged increase and achievable.</p>
15.	<p>Aboriginal Heritage Office Ku-ring-gai, Lane Cove, North Sydney, Northern Beaches, Strathfield & Willoughby Councils</p>	<p>The Aboriginal Heritage Office (AHO) is a unique partnership of six Sydney Councils and provides key advice and expertise to the partners, including Willoughby which is a founding Council from 2000, to protect the Aboriginal sites and promote Aboriginal history and heritage in each of the Councils areas. The AHO’s activities are based on three main areas: site management, council support and education.</p>	<p>Noted.</p> <p>The AHO has reviewed the LSPS and suggests edits all of which have been noted and applied where appropriate.</p> <p>..</p>

16.	Shelter NSW	<p>Major recommendations include:</p> <ol style="list-style-type: none"> 1. Amend commentary throughout the LSPS to reflect that affordable housing is targeted at all lower income households and not specific professions. 2. Review and amend Willoughby DCP so <ol style="list-style-type: none"> a. all new apartment development achieves the silver level of the Liveable Housing Design Guidelines (LHGD) from Liveable Housing Australia, allowing 'visitability' of dwellings for people with mobility issues b. a proportion of all apartment development achieves the gold or platinum level of the LHDG 3. Include explicit actions and outcomes indicators, which stipulate the built environment and amenity in the LGA will be designed to be accessible to all members of the community. 4. Apply the contributions for affordable housing described in the LSPS (4% of total floor space of new development up to 10% by 2026) to the whole LGA and not just in specific areas. These contributions should apply to all development and not to up zoned land only. 5. Set a target for the affordable housing to be delivered when Council land is redeveloped for housing purposes. Shelter NSW believes a 30% target would be appropriate. 6. Recognise specifically affordable housing as essential social and economic infrastructure in the LSPS 7. Consider exempting Community Housing Providers from contributions levied through section 7.11 and 7.12 8. Revise affordable housing dwellings target for 2036. We recommend for the target to be at least 200 dwellings and believe up to 500 dwellings could be achieved with the right mechanisms in place. 9. Consider allowing social and affordable housing managed by a CHP or government 	<ol style="list-style-type: none"> 1. Noted. Council prioritises Affordable Housing for key and essential workers and other priority groups (as identified). Eligibility is based on low to medium household income. 2. To be considered as part of the review of Willoughby DCP. 3. Noted. 4. Noted. This would require a major amendment of our current SEPP 70 scheme and would not likely be feasible or achievable. 5. Noted. Council is committed to developing land for the purposes of providing affordable housing. Yield is calculated on a site by site basis based on a number of factors. Applying a 30% target is arbitrary as it may not be achieved or may be exceeded depending on the subject site. 6. Council recognises the need for Affordable Housing having operated an affordable housing program since 1998. Council has an Affordable Housing Strategy. This is presently been updated to be congruent with the Draft Council LSPS & Housing Strategy. 7. Under the current Willoughby Local Infrastructure Contributions Plan,

		<p>provider exclusively in light industrial zone when this does not preclude achieving the primary objectives of the strategy</p> <p>10. Add an advocacy action in Priority 2 for Council to advocate to State Government for more investment in social and affordable housing to reflect what is stated in the introduction of the section.</p> <p>11. In Priority 19, add an action stating Willoughby Council will take steps towards working with NSROC and neighbouring councils to develop an affordable housing strategy for the area across Council borders.</p> <p>12. Include specific housing affordability indicators as part of Council monitoring strategy for the implementation of the LSPS and the LHS.</p>	<p>affordable and social housing is exempt from contributions levied through section 7.11 and 7.12.</p> <p>8. A specific numeric affordable housing target has been replaced by a proposed target of 7-10% GFA of new housing by 2036. This target is consistent with existing Council policy.</p> <p>9. Social and affordable housing in light industrial zones is not supported being in conflict with the North District Plan to protect and maintain this scarce land for employment and urban services.</p> <p>10. Agree with amended advocacy action being included in Priority 2 of the LSPS.</p> <p>11. Council's Affordable Housing Strategy includes actions to advocate for affordable housing at a local, district and metropolitan level.</p> <p>12. Affordable housing target indicator included under Priority 2. Council regularly monitors local medium rents and benchmarks these against very low to moderate household incomes.</p>
17.	Keylan Consulting P/L (Submission one of two)	<p>This is a site-specific submission relating to land owned by Charter Hall located at the corner of Eastern Valley Way and Smith Street East Chatswood.</p> <p>The Charter Hall site has an area of</p>	Noted. To be considered as part of the Industrial Lands Strategy to be undertaken as a priority during 2020.

		<p>approximately 2.07 hectares and is occupied by a number of large format retail premises. The site and the broader locality contain a diverse mix of land uses including retail, childcare, recreation (fitness centres and dance studios), religious centres, commercial and business premises, cafes, self-storage and urban services. Charter Hall considers that its site can play a crucial role in supporting the on-going viability of the East Chatswood employment area through a greater diversity and density of employment types that will contribute to the key priorities of the draft LSPS</p>	
18.	Mecone (on behalf of Arkadia)	<p>Arkadia broadly supports the Priorities and Actions within the Draft LSPS. This submission focusses on the Arkadia site at 300-316 Willoughby Road, Naremburn. to ensure the vision and development potential for the Naremburn Local Centre provided in the draft LSPS and Local Centres Draft Policy can be realised.</p> <p>An analysis of the Indicative Master Plan for the Naremburn Local Centre as provided in the Local Centres Draft Policy has identified issues such as;</p> <ul style="list-style-type: none"> • The difficulties of relying on site amalgamation to enable renewal; • The impacts of site slope on parking provisions, pedestrian priority and place making; • The need to pool lot configuration (depth) to support quality retail tenancies; • The importance of future development scenarios also seeking to provide local commercial floorspace in addition to retail; and • The delivery of only modest dwelling outcomes for a significant site and opportunity. <p>The Vision Statement and AE Design Urban Design Analysis aims to show how a number of modest and complementary alternate scenarios can ensure that the Naremburn Local Centre, including 300–316 Willoughby Road, can be planned and transformed.</p>	<p>Noted.</p> <p>The comments regarding 300-316 Willoughby Rd are noted. The final local centres strategy supports a 6 storey height and 3:1 FSR on this site and work on the new LEP and DCP will further examine appropriate site specific development controls.</p>
19.	(Rev) Karen Paull Lane Cove Community Chaplain	<p>Given strong community expectation in the area of affordable housing, I would like to see the inclusion of an explicit numerical target for affordable housing accessible for low to</p>	<p>Noted. See responses to Shelter NSW submission above (submission 16 and 14)</p>

	Lane Cove Community Chaplaincy	<p>moderate income residents – preferably 10-15% delivered on-site – and see the language strengthened in support of affordable housing throughout both the LSPS and the LHS. I particularly support the elements of the Willoughby Council Local Strategic Planning Statement (LSPS) related to provision of affordable housing.</p> <p>These comments are informed by and reflect the principles for affordable housing in Local Strategic Planning Statements recently published by the state’s peak body for housing policy and advocacy, Shelter NSW.</p>	
20.	Ethos Urban	<p>Council has a significant opportunity to champion a new and innovative land use composition in Sydney that integrates urban services, commercial and residential uses within a purpose-built urban setting specifically designed to ensure their successful co-location.</p> <p>Submission focuses on George Place Artarmon and strongly advocates for greater flexibility in the implementation of the GSC’s objective for industrial and urban services lands to be retained and managed. Propose LSPS should allow for opportunities to deliver genuine well-planned mixed-use proposals that add substantially to the store of employment opportunities in the right industries, whilst also supporting the achievement of the Greater Regional Plan’s priorities. To unlock opportunities for the Precinct to contribute to the vision for Willoughby through the delivery of several Planning Priorities. These include:</p> <ul style="list-style-type: none"> • Creating a great place a diversity of activities. • Ensuring the future retention, management and increase in the provision of urban services by reimagining the way these uses occur. • Contributing to the delivery of new dwellings that will support housing diversity within the area, whilst facilitating the achievement of the housing targets (and affordable housing targets) set for the LGA and North District. <p>Seek various amendments to facilitate delivery of an increased number of medium and high-density dwellings, increasing dwelling diversity and opportunities for affordable housing in the</p>	<p>Noted.</p> <p>The recommendations are not supported as they could adversely impact on the supply of industrial and urban services land in the LGA.</p> <p>They will however be considered during preparation of the Industrial Lands Strategy to be undertaken in 2020.</p>

		LGA.	
21.	City Plan on behalf of Henroth	<p>Submission on behalf of Henroth, owner of the land at 754 Pacific Highway, Chatswood. The site is within the Chatswood CBD boundary. Submission seeks to:</p> <ol style="list-style-type: none"> 1. Adjust the actions of the LSPS: <ol style="list-style-type: none"> a. to support finalisation of the CBD Strategy; and b. for the Strategy, once completed, to form the guiding vision for the Chatswood CBD. 2. Include the land west of the Pacific Highway in further with a view to identifying this land for growth in the short term with increased potential for height and FSR. 3. If Council is not of a mind to identify this land for short term growth, Council should nominate the subject site and surrounding B5 precinct west of Pacific Highway as an investigation area subject to a landowner-initiated planning proposal. This approach will allow for the in-depth investigation of future development potential and management of its impacts in a more flexible timeframe that is better able to respond to market demand. 	<p>The site in question, zoned B5 Business Development, is on the western side of the Pacific Highway, within the Chatswood CBD. However this and the other sites in this location are not identified for change under the CBD Strategy at this time. This approach does not curtail future strategic planning if considered appropriate.</p>
22.	Rob Floyd Associate General Secretary Uniting Church in Australia Assembly	<p>Would like to see language strengthened and specified in relation to several issues experienced by our communities, in particular a commitment to a target for affordable housing of at least 15% of total floor space of new developments, preferably delivered on-site. These comments are informed by and reflect the principles for LSPSs recently published by the state's peak body for housing policy and advocacy, Shelter NSW.</p>	<p>Noted. Refer to responses on these issues (submissions 14 & 16).</p>
23.	Kaufland Australia P/L	<p>Kaufland is keen to establish full-line supermarkets in Australia and Willoughby LGA in particular.</p> <p>Kaufland is generally supportive of the draft LSPS and makes the following comments for consideration:</p> <ul style="list-style-type: none"> • recommended highlighting the future role retail trade will play in the employment space in Willoughby LGA. • greater business zoned land for retail and commercial premises, including additional B7 Business Park zone in current industrial land precincts. • greater permissible zones for retail 	<p>Comments and recommendations noted.</p> <p>Broader consultation has been undertaken on the draft LSPS during the recent public exhibition period.</p> <p>Specialised retail premises are currently permitted in the B3 Commercial Core, B4 Mixed-use and B5 Business Development zones in the Willoughby LEP 2012. Other retail uses are also permitted in these zones.</p>

		<p>premises in large lot area near existing employment generating uses.</p> <ul style="list-style-type: none"> • consultation should include other key stakeholders such as the private sector. • more specific actions re investment attraction for service and employment demands to 2036 to increase economic development. 	<p>These matters can be further considered as part of the Industrial Lands Strategy and comprehensive LEP review to be undertaken in 2020. Further community and industry consultation will be undertaken at this time.</p>
24.	Keylan Consulting P/L	<p>Requested that the following recommendations be thoroughly considered by Council and, where relevant, incorporated into the final LSPS.</p> <ol style="list-style-type: none"> 1. Acknowledge that the Health and Education Precinct comprises both existing government-owned health and education precincts and adjoining areas health related and complementary land uses. 2. Include a clearly defined and prioritised strategic process to identify the on-going economic, employment and land requirements for the growth of the Health and Education with an accompanying commitment to review and update zoning and other relevant planning controls to facilitate this growth. 3. Remove the target of “no decrease in amount of industrial zoned land” as it pre-empts the findings of the industrial lands strategy. 4. Undertake the industrial lands strategy as a matter of priority and ensure it entails a comprehensive and fine-grained review of the location, existing use/s and optimal future use/s of land zoned for industrial purposes. 5. Ensure the industrial lands strategy specifically considers the on-going suitability of the land bound by Reserve Road, Frederick Street, Westbourne Street and Herbert Street locality for traditional industrial uses and zoning, particularly in the context of its existing mixed use nature and its physical and functional relationship to the Health and Education Precinct rather than industrial and urban services to the north. 6. Set any targets relating to the quantum of industrial zoned land to be retained and, conversely, the location and quantum of industrial zoned land suitable for rezoning for other uses, following the completion of the industrial land strategy. 7. The LSPS and resultant Willoughby Housing 	<p>Comments noted. Council currently supports proposals for health facilities including hospital uses to be considered on a case-by-case basis in the Artarmon industrial area and within close proximity to the existing health and education precinct at St Leonards.</p> <p>The final LSPS has been amended to refer to possible expansion of the Health and Education Precinct close to the RNSH while trying to balance the direction in the North District Plan to manage these employment lands for urban services.</p> <p>Consideration of this potential expansion is to be undertaken in conjunction with preparation of an Industrial Lands Strategy and will also be subject to further consultation with other stakeholders.</p>

		Strategy should comprehensively review the appropriateness of a range of housing types in all locations across the LGA. This includes the suitability of the 12 Frederick Street site and broader Health and Education Precinct to contain a greater diversity of housing types which would contribute to the LSPS's Priorities and actions relating to housing diversity and affordability and the provision of housing for key workers in the right locations.	
25	Resident	<p>Would like to see language strengthened and specified in relation to several issues experienced by our communities related to affordable housing including a commitment to a target for affordable housing of at least 15% of total floor space of new developments, preferably delivered on-site.</p> <p>These comments are informed by and reflect the principles for affordable housing in Local Strategic Planning Statements recently published by the state's peak body for housing policy and advocacy, Shelter NSW.</p> <p>In the Local Housing Strategy (LHS):</p> <p>The overall vision for the inclusion of affordable housing and diversity of housing types is supported.</p> <p>Concerned about the overall numerical targets. The community should be able to track the progress of the council in delivery of affordable housing.</p> <p>Want the inclusion of an explicit numerical target for affordable housing accessible for low to moderate income residents – preferably 10-15% delivered on-site – and strengthen in support of affordable housing throughout the document.</p>	Noted. See responses to other similar submissions including Shelter NSW submission (submission 14 and 16).
26	Legacy Property	<p>Legacy Property recommends that Council:</p> <ul style="list-style-type: none"> • Work to resolve DPIE comments on the Chatswood CBD Planning and Urban Design Strategy to 2036 in a manner that supports the feasibility of amalgamating and redeveloping existing properties, and maximises the development opportunity on sites that are feasible to develop • Adopt a more ambitious approach to future 	<p>Comments noted in relation to the particular elements of the LSPS like <i>Chatswood CBD Strategy</i> and <i>Housing and Local Centres Strategies</i>.</p> <p>The final version of the <i>Local Centres Strategy</i> allows for an increase of 467 dwellings in</p>

		<p>housing potential within the Artarmon and Northbridge local centres</p> <ul style="list-style-type: none"> • Identify opportunities for new housing in locations that offer 'bushland' character and are likely to be more appealing to existing ageing residents that need to downsize • Identify the isolated George Street industrial precinct for urban renewal to higher density residential uses • Moderate its value capture expectations (ie 50% of value uplift) and ensure that these are more clearly defined to provide certainty and transparency • Reduce the proposed minimum 1:1 non-residential FSR as a blanket approach throughout the proposed B4 Mixed Use zone under the Chatswood CBD Planning and Urban Design Strategy to 2036. 	<p>Northbridge and 224 in Artarmon. Council is well placed for achieving its short term and longer term housing targets without increasing the density beyond that envisaged by the <i>Local Centres Strategy</i>.</p> <p>The aim of the <i>Housing Strategy</i> is to focus future housing growth within the Chatswood CBD, local centres and R3 Medium Density and R4 High Density Residential areas. The LSPS refers to future potential residential development in other areas subject to further criteria (see Priority 1 – Supply and location for new housing).</p> <p>In relation to the George St industrial area, refer to response for submission 21.</p> <p>Council is currently examining other refinements regarding the CBD Strategy.</p>
27	AMP Capital	<p>Recommendations of AMP's submission include:</p> <ol style="list-style-type: none"> 1. Northbridge structure plan needs to be amended to recognise the significant potential presented on the Northbridge Plaza site and surrounds and its potential to deliver a high quality, mixed-use development as foreshadowed in the Draft <i>Local Centres Strategy</i>. 2. Increase in density for housing and employment floorspace in the Northbridge local centre is supported in order to manage the forecasted increased population and economic growth. 3. Change from the identified non-residential zoning to mixed-use zoning along Sailors Bay Road is needed to facilitate the creation of a vibrant and diverse local centre at Northbridge. 4. Support the investigation and realisation of the proposed eastern public transport corridor. 5. Delivery of a new corridor will contribute greatly to aligning land use, transport and social planning to deliver better outcomes for the 	<p>Council's <i>Local Centres Strategy</i> supports the revitalisation and growth of the Northbridge local centre acknowledging the role of the Northbridge plaza and council car park in providing increased housing opportunities, a public open space square and increased commercial floor space. Future LEP and DCP controls will be developed to include provisions that address amenity.</p> <p>The Draft LSPS recommends an increase in affordable housing in line with the North DP.</p> <p>The LSPS including the affordable housing targets it contains will be subject to review by the GSC.</p>

		<p>community. Further investigation into additional public transport options to local centres is supported to best realise the '30-minute city'.</p> <p>6. Clarification is sought on Council's intended changes to affordable housing contributions. In addition, it is recommended for the Greater Sydney Commission (GSC) to review the affordable housing targets set by each LGA and provide consistency across Greater Sydney. All Councils should deliver the same amount of affordable housing across the metropolitan area.</p>	
28	Salvation Army	<p>The Salvation Army is broadly supportive of LSPS contents in principle.</p> <p>It is requested that Council give further consideration to the following matters to strengthen the ability of the LSPS to deliver on the challenges and opportunities facing the LGA and deliver on the state and council's policy agenda:</p> <ul style="list-style-type: none"> • Recognise that areas proximate to centres, public transport and open space are well suited to accommodate a larger amount of growth and greater housing diversity through medium density rezonings; • Recognise that despite some areas being zoned R2 Low Density Residential, the following attributes make them suitable for targeted medium density development: <ul style="list-style-type: none"> - Proximity to existing centres, social infrastructure and public transport; - Proximity to a range of established high and medium density housing typologies to provide diverse housing options for the growing population; - Ability to respond to the heritage conservation area given that the heritage conservation area already incorporates a mix of residential densities and design can sensitively respond to this area in a highly accessible location. • Review the application of heritage conservation areas, particularly with sites located on the border of these areas and are well suited to accommodate development uplift; and • Consider the above recommendations in relation to 23 Archer Street Chatswood. 	<p>The statements relating to medium density housing provision are noted.</p> <p>The subject site (23 Archer Street) is outside the existing, as well as the proposed Chatswood CBD boundary under the CBD Strategy. The site is zoned R2 Low Density Residential and is part of the South Chatswood Heritage Conservation Area under WLEP 2012.</p> <p>The CBD Strategy has been designed as part of the <i>Draft Housing Strategy to 2036</i> and <i>Draft Local Centres Strategy to 2036</i>. These strategic planning documents seek to locate additional housing either on the edge of the CBD within the CBD boundary or in identified local centres, in preference to existing R2 Low Density Residential zones and heritage conservation areas.</p>

		<p><u>23 Archer Street Chatswood</u> - it is requested that as part of the next review of the Willoughby LEP, a review of the zoning within the heritage conservation areas be undertaken where particular sites are located in areas which can accommodate additional capacity. This would inform urban design analysis to assess the capacity of the site for upzoning to R3 Medium Density residential. The application of additional height and FSR that is commensurate with the controls on the northern side of Johnson Street has the ability to create an improved urban design outcome, in turn creating an economically viable area through increased capacity for future residential development and housing choice.</p>	
29	Land and Housing Corporation DPIE	<p>Willoughby LGA plays an important role in the provision of social housing for the Sydney region, with 446 social housing dwellings in the LGA comprising almost entirely units (93%) and some cottages and townhouses. A significant portion of the housing stock is aging with 45% over 41 years old. The assets are typically dispersed across western and central portions of the LGA.</p> <p>The NSW Government's Future Directions in Social Housing Strategy was released in 2016. Under this strategy LAHC has been delivering the Communities Plus program, the Government's key initiative to grow the social housing portfolio. The program will deliver new and replacement social housing, affordable housing and private housing through the renewal of existing assets.</p> <p>We acknowledge Council's ongoing commitment to affordable housing and its intentions to increase affordable housing targets in the LGA.</p> <p>We suggest that the LSPS be amended to include an action which acknowledges the Communities Plus program and Council's role in supporting LAHC in its implementation. The following wording is suggested for these actions:</p> <p>Council will continue to work with the NSW Land and Housing Corporation to support the renewal of social housing within the LGA, consistent with the Future Directions for Social</p>	<p>Council notes and agrees with the points made in the submission.</p> <p>It is proposed to include additional LSPS action supported acknowledging and supporting the Communities Plus Program (Priority 2).</p> <p>The following points are also noted:</p> <ul style="list-style-type: none"> • Council's Community Development staff actively collaborate with Community Housing Providers contracted to provide social housing on behalf of LAHC to improve outcomes for social housing tenants within the LGA. • Council has worked closely with St George Community Housing to support the successful transfer of social housing tenancies from LAHC.

		Housing policy, including through facilitating changes to the planning framework for public housing assets where required {short to medium term).	
30	Ethos Urban (for Roluke)	<p>The following key recommendations are made in relation to the Draft LSPS:</p> <ul style="list-style-type: none"> • Council should undertake a strategic review and specific master planning exercise of the Artarmon Employment Lands in concert with key landowners; • The Draft LSPS should inform rezoning of part of Roluke’s land holdings (‘Land Holding 2’) from the current IN1 General Industrial zone to B7 - Business Park, in line with the remainder of the land holding; and • The Draft LSPS and recommended master planning exercise, should inform an increase to the maximum FSR for the B7 - Business Park zone. <p>This submission has detailed the key industrial land holdings of Roluke on or near Pacific Highway at Artarmon (various sites located on Pacific Highway, Carlotta Street and Dickson Avenue Artarmon). These are zoned both B7 Business Park and IN1 General Industrial zone. Key comments and recommendations for these sites have been made with regards to the Draft Willoughby LSPS.</p> <p>Submission puts forward, what are described as, several compelling planning reasons for the proposed recommendations, including: The gateway location at the interface of the Pacific Highway and Artarmon Industrial Area, and proximity to the nearby Artarmon and St Leonards rail stations and centres; The existing Floor Space Ratio on the site is not well suited to accommodate growth in employment and limits the potential for future redevelopment; Increased flexibility in terms of built form and development footprints, provided through an increased FSR, will ensure the protection and enhancement of the Artarmon Industrial Area consistent with the Draft LSPS; To cater for global and local trends as well as the land use requirements of modern businesses and the expectations of customers, innovative and flexible built form controls will be required; and</p>	The matters relating to the identified sites and the Artarmon industrial lands are noted and will be considered as part of work on the Industrial Lands Strategy to be undertaken in 2020.

		The current zoning arrangement of 'Land Holding 2' is not reflective of the current land use or tenure arrangement and unduly limits the potential for future redevelopment.	
31	Link Housing Northern Region - SGCH	<p>Together Link Housing and SGCH are the primary community housing providers in the Willoughby LGA, providing social housing services to over 600 low income households. We both have local offices in the Willoughby LGA and are committed to providing responsive housing services to our tenants and local communities.</p> <p>Increasing the supply of affordable housing The current target of 80 new affordable housing properties by 2036 in the draft LSPS represents just 1.2% of the overall increase in housing supply of 6,700 dwellings. This figure would benefit from further consideration, it is a particularly low number of affordable dwellings as a proportion of the total projected increase in housing supply.</p> <p>The Greater Sydney Commission suggests that affordable housing targets of between 5% and 10% of new residential floor space subject to viability should be considered for new developments. Therefore, based on the projected 6,700 new dwellings to 2036 and the Greater Sydney Commission targets, between 335 and 670 affordable housing properties would suggest a more aspirational approach to affordable housing delivery.</p> <p>Priority 2: Increasing the supply of affordable housing: The draft LSPS contains an action to increase the proportion of total floor space to be delivered as affordable housing in new developments from 4% to 7% by 2021 and to 10% by 2026. However, this action does not seem to align with the number of additional affordable housing stated in the earlier section of the document. It would be useful for Council to identify how the increases in total floor space to be delivered as affordable housing aligns with the total additional stock numbers (80) identified as affordable housing in the draft LSPS.</p> <p>Maintain Council's community housing</p>	<p>Council has amended the draft LSPS and replaced the numerical target with 7-10% GFA of new housing by 2036 in line with existing Council policy. Note that this will be subject to future Council support, project feasibility and more detailed modelling.</p> <p>Council has an Affordable Housing Strategy. This is presently been updated to be congruent with the Draft WCC LSPS and <i>Housing Strategy</i>.</p> <p>Additional comments on affordable housing provision are noted.</p>

		<p>program.</p> <p>It is pleasing to note that Council have an action to maintain Council's community housing program. We would welcome the opportunity to work with Council to maximise opportunities to deliver suitable housing options for residents of Willoughby City Council LGA. We believe that community housing providers are the most able organisations to deliver and manage affordable housing. Collectively we manage over 1,000 affordable housing tenancies and have significant expertise in the delivering both the tenancy and property services to ensure an excellent service for residents and property owners.</p> <p>Deliver affordable housing when Council owned land is redeveloped for housing purposes. The opportunity to deliver higher levels of affordable housing on Council owned land is one that should be investigated to discuss and agree the maximum levels that can be delivered. As stated above community housing providers are well placed to work closely with Council to maximise these opportunities, as not for profit organisations our business model is aligned with delivering social outcomes with a long-term approach rather a short-term financial focus.</p> <p>Link Housing and SGCH have both worked very successfully with local councils to maximise the use of council owned land to deliver housing outcomes for residents on low and moderate incomes. A range of targets have been proposed for affordable housing on state owned land which range from 30% up to 50%, further discussion on this topic would be welcomed.</p> <p>A number of reports have demonstrated that increasing the proportion of affordable housing as part of the housing mix will have significant economic and social benefits.</p>	
32	Resident	<p>The NDP wants more diverse housing and I agree. What does 'other families' include? Where are co-operatives, retirement villages and nursing/respite homes represented? Our <i>Green City Plan 2028</i> established indicators, outcomes and priorities included here 'where relevant'. I would expect all to be identified and</p>	<p>Refer to other affordable housing submissions 14, 16, 27, 29 & 31.</p> <p>Other comments are noted.</p> <p>Proposed that Artarmon will form part of a potential future</p>

		<p>relevant in a document of this status and if not, I would be interested in knowing what they were and why they are not relevant. Chatswood DCP I think the use of the word 'sustainable balance' in this context is inappropriate, 'balance' is sufficient Target of 80 AH by 2036 is shamefully low.</p> <p>Item 3 either \$ expenditure &/or quantum of regional quality shared bike/ped pathway p.a. perhaps demonstrate some leadership with neighbouring councils? Where is social infrastructure defined? What is the NS Social Infrastructure Strategy? Is there nothing 'relevant' identified in OFW 2028? p.18 Item 12 Stasis / 'No decline' is a shameful aspiration for a leader in sustainability Item 13 ditto Item 14 why not push that to 50%? Item 15 These are commendable targets, if I am not mistaken, established by previous councils p. 19 Item 16 What is 'Resilient Sydney'? Do we have no local thoughts on this? Is there nothing in OFW 2028 that's 'relevant'? P.25 Pleasing to see Council meaning to advocate to state govt on this matter. Shift the targets forward i.e 10% by 2021 and 15% by 2026. Require proportions of upzoned stock in LCS to achieve these targets. p. 27 The word missing here is advocacy (what barriers are caused by the Gore Hill Freeway? And yes, let's have access under the rail line between Artarmon Park and Artarmon Reserve) pp. 28 – 30 There is no acknowledgement of the potential for conflict in use of /access to open space and these conflicts have potential to grow. Open space appears to be conflated with sportsfields. It has often been stated that there are inadequate sportsfields on the LNS. Whilst it is inadequate to meet demand and it is a traditional use of open space logically, this cannot continue without challenge. Organised sports, being organised are better able to represent their participants. Users who recreate informally in small groups and individually are increasingly impacted by sporting fixtures as are urban bushland and residential amenity values and it is not clear what principles are being used to address these conflicts. p.31 The authors appear to be unaware of the Aboriginal Heritage Office. It would be</p>	<p>eastern public transport route and Council advocates to TfNSW to increase frequency of services for all bus routes, particularly to stations and local centres in the LGA.</p> <p>Council's <i>Our Green City Plan</i> provides actions in a number of areas including to:</p> <ul style="list-style-type: none"> Reduce carbon and greenhouse gas emissions Promote sustainable lifestyles and practices Enhance, protect and respect waterways, bushland, nature, wildlife and ecological systems Reduce energy, water and resource waste and Encourage reuse and recycling. <p>Information on these actions has been included in the revised LSPS.</p> <p>Council's Draft <i>Integrated Transport Strategy</i> will also address and advocate for improved transport outcomes in the LGA. It will be placed on public exhibition in early 2020.</p>
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		<p>interesting to know what quantum of interaction the Council has sought from the MLALC and on what matters. Indigenous skills/knowledge should be engaged re land management, fire risk reduction, water quality</p> <p>p. 34 'Local centres which are located on a potential eastern public transport route are Artarmon' - ? No, Artarmon is on the rail line, please check the map on p. 20</p> <p>The balance required to maintain one of TfNSW's 'vibrant centres' on arterial roads will be tricky – I expect your LCS explains how this will be achieved? If not, who does and more importantly when will it be known?</p> <p>p.36. Council will need to be more assertive in advocating for integrated transport. Despite spirited advocacy re bike access at Chatswood the Interchange is a nightmare.</p> <p>p.38 suggest you institute a Loop service (funded by parking revenue) on the route suggested - or maybe just a regular shuttle between bus stops on Willoughby Rd & Northbridge (the Frenchs's Rd /Alpha Rd / SB Rd leg)</p> <p>p. 51 How is the 40% target to be met? How about shortening the timeframe?</p> <p>pp. 52 -55 policy is needed to reduce demolition of buildings in favour of adaptive reuse with environmentally sustainable maintenance programs (progressively implemented, to reduce costs) - applied at least to Council's own properties.</p> <p>p.53 It would be of more appropriate now, to know how Council/the WCC community is tracking with those energy & waste targets - rather than restating the aspiration. What additional measures can/need to be applied?</p> <p>p. 55 'where possible' is insufficient a motivator for good behaviour.</p> <p>p.56 There is little innovation here. Planting trees is very good but simply not enough. I am disappointed. The document is unambitious.</p>	
33.	Woolworths Group	<p>Woolworths makes the following general comments in relation to the draft LSPS:</p> <ul style="list-style-type: none"> ● The LSPS generally notes that growth in the identified centres will meet the anticipated housing requirements of 6,000-6,700 dwellings by 2036. This appears to assume take up of approximately 80%. The take up rate across the 	<p>Comments noted.</p> <p>Priority 6 –point 5 – Council has listed as one of its actions in its Draft <i>Integrated Transport Strategy</i> (ITS) to review freight movements in around the</p>

		<p>LGA should be monitored over the coming years, and should growth not be in line with expectations, Council should consider opportunities to further increase capacity beyond that identified in the Draft Housing Strategy and the LSPS.</p> <ul style="list-style-type: none"> ● Generally, any future controls in local centres should not unreasonably restrict the type or size of retail premises – full-line supermarkets should be supported where demand can be demonstrated. ● Woolworths supports Council’s approach to maintaining the primacy of employment uses in commercial and industrial zones. However, Council should continue to consider mixed-use development where it can be demonstrated that residential uses support and complement the provision of employment uses. <p>Priority 6: Planning for local centres which are vibrant places that meet the everyday needs of the population</p> <ul style="list-style-type: none"> ● Woolworths supports a review of planning controls in local centres to support site amalgamation and renewal. Any future controls should support a diversity of retail types, including full-line supermarkets. We note that supermarket development can be subterranean, supporting fine-grain retail and public domain across the ground plane. Future controls should not unreasonably restrict the size or type of retail development in local centres. ● Woolworths does not support restrictions on retail development outside of local centres. The difficulty of amalgamating land in local centres, given fragmented ownership, land costs and other local constraints, means that supermarket development must sometimes occur outside of local centres, or in unanticipated out-of-centre hubs. Out-of-centre retail should be considered where it can be demonstrated that the viability of local centres will not be significantly affected. <p>Priority 10: Protecting the role of Willoughby’s industrial lands as urban service hubs for the Lower North Shore</p> <ul style="list-style-type: none"> ● Woolworths supports the preparation of an industrial lands strategy for Willoughby LGA. This strategy should be prepared and exhibited prior to the finalisation of the LSPS, to ensure 	<p>Chatswood CBD and Industrial Centres. It will work with both adjoining councils and the State government to ensure an integrated approach to freight and logistics planning for its Industrial Centres</p> <p>Priority 15 –point 1 - Council has listed as one of its actions in its Draft <i>Integrated Transport Strategy</i> to prepare a report on the feasibility of all Council vehicle fleet to become EV, this includes EV and hybrid heavy fleet, plant and equipment. The flow on effect will relate to developments.</p> <p>Priority 15 –point 2 - Council is currently in the process of completing a review of its Development Control Plan (DCP), with specific emphasis on increasing efficiency and effectiveness of car parking required as part of development.</p> <p>Councils Industrial Land Strategy is expected to only be in draft form before the LSPS is completed. The government deadline for the LSPS is 31 March 2020, but the document will be kept under regular review.</p>
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		<p>that its outcomes can be adequately reflected in the LSPS actions.</p> <ul style="list-style-type: none"> ● Woolworths congratulates Council on recognising the rise of e-commerce, rapid delivery and innovation. Council should consider undertaking a review of land uses in industrial zones, potentially as part of preparing the industrial land strategy, to ensure that development controls continue to meet the needs of innovative retail distribution models. This includes consideration of hybrid land uses, incorporating both retail and distribution uses in an integrated model, noting that these models can ensure that the primacy of industrial uses is maintained, and the amount of employment floor space can either be maintained or increased. ● Woolworths strongly supports optimisation of the freight handling and logistics network in and around industrial lands – efficiency of movement is critical to the operation of distribution centres within these areas. In particular, Council should work with both adjoining councils and the State government to ensure an integrated approach to freight and logistics planning. <p>Priority 15: Improving the efficiency of Willoughby’s built environment</p> <ul style="list-style-type: none"> ● Woolworths supports consideration of electric vehicles (EVs) in future planning. In particular, Council should consider how electric trucks and delivery vehicles will lessen the impacts of servicing supermarkets, warehouse and distribution centres – for example, reduced noise impacts will allow for longer delivery windows and more frequent deliveries. ● Car parking provision for retail development should be maintained in any future planning controls. Although Woolworths supports the encouragement of public transport use and car sharing, supermarkets are heavily reliant on adequate, dedicated car parking to achieve viability. Future controls should not unreasonably restrict the amount of car parking that can be provided for retail development. <p>Priority 17: Augmenting local infrastructure and using existing infrastructure more intensively and efficiently to accommodate planned growth</p> <ul style="list-style-type: none"> ● Woolworths agrees that adequate provision of infrastructure is critical to supporting future growth across the LGA. However, any value 	
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		capture should be appropriately benchmarked against development feasibility to ensure the continued viability of all development types, including employment-generating development.	
34	Ethos Urban on behalf of Mirvac	<p>Actions recommended in the submission include: Consider permitting residential uses in the commercial core of the Chatswood CBD. Council to address the cumulative impacts of development contributions.</p> <p>Council to review position on affordable housing and undertake feasibility testing of proposed affordable housing requirements. Mirvac recommends that Council investigate additional residential capacities within Artarmon/St Leonards and Chatswood. Council to investigate affordable housing and consider build-to-rent development models within the LSPS in the above locations.</p> <p>Council prioritise facilitating additional dwellings and commercial floor space in a revision of planning controls in local centres</p> <p>. For 39 Herbert Street, Artarmon, Mirvac requests that Council:</p> <ul style="list-style-type: none"> – In addition to the permissible uses on the site under the IN2 Light Industrial zone, permit a range of additional uses on the site, including health services facilities, offices, business premises, education and potentially other employment generating uses; and – Consider a maximum FSR control of up to 3:1 for the site, which will allow the existing permissible uses (and any additional permitted uses) to intensify, which would incentivise the redevelopment of the site and precinct and allow for more employment generation. <p>It is recommended that Council undertake a detailed market study for the precinct and engage with the key landowners to determine the long term market need for the whole precinct. Council should consider an FSR control up to 3:1 for the precinct. This would catalyse development within the precinct, providing higher employment densities within proximity of St Leonards Station and the future Crows Nest Metro Station.</p>	<p>Council is in the process of finalising details regarding the Chatswood CBD Strategy following comments from DPIE including revisiting the planning agreement policy.</p> <p>The Local Centres Strategy balances the desire of the community to retain the local character of each centre with the opportunity to increase housing growth in areas close to public transport and other existing facilities and infrastructure.</p> <p>The matters relating to 39 Herbert Street are noted and the Artarmon industrial lands will be considered as part of the Industrial lands Strategy to be undertaken in 2020.</p> <p>The LSPS has been amended to refer to possible expansion of the Health and Education Precinct close to the RNSH. This will continue to allow suitable health and education proposals to be considered within this area on a case by case basis.</p>

		<p>Action: Council to address the retention of existing zoning within Industrial Lands Study. Protect Artarmon’s critical urban services and Council to review land uses along transport corridors, ensuring capacity for density is delivery through revised planning controls.</p> <p>Council and the GSC to review planning controls to facilitate growth and renewal in both Chatswood and St Leonards strategic centres. In the case of St Leonards, Artarmon will play a critical role in supporting the development of the St Leonards Health and Education Precinct.</p> <p>The existing industrial zoning will need to be amended to allow for greater commercial diversity within Artarmon. Mirvac maintains that uses such as retail and commercial would be well placed within these industrial lands.</p>	
35	Resident	<p>HOUSING THE CITY Very little has been said in this plan about St. Leonards - where the focus of my interest is.</p> <p>The new LSPS states that "medium density housing will be increased as a component to provide appropriate housing for ageing residents and for families."</p> <p>I think that the increase of medium housing would be great, however it is not stated what form or where this medium housing would be There is a need for more 1, 2 and 3 bedroom units and a decrease in the number of bed/sitter units - which are possibly used more for the transient Airbnb trade.</p> <p>What plans are there in place for the increased ageing population? There is little property in the area that the older population can moved to without moving to high rise.</p> <p>High rise, in general, does not promote a community feeling and many are left feeling isolated.</p> <p>A CITY FOR PEOPLE I do not believe that pavements should be shared by pedestrians and cyclists as they are a danger to pedestrians. I am quite happy for cycle tracks to be increased as long as there is separation from pedestrian areas.</p>	<p>HOUSING THE CITY</p> <p>Comments on St Leonards noted, with finalisation of the <i>St Leonards and Crows Nest 2036 Plan</i> by DPIE awaited.</p> <p>With the development and implementation of its final Integrated Transport Strategy, Council will be in a position to improve access for ageing residents to transport.</p> <p>A CITY FOR PEOPLE In planning for increased active transport options and choice, Council intend to upgrade pedestrian and cycle access between Herbert Street and Hampden Road linking Artarmon to St Leonards as well as shared pathway connections along the Pacific Highway also linking Artarmon and St Leonards. This work will incorporate tree planting, public seating and end of trip facilities.</p> <p>A CITY OF GREAT PLACES Aligning the open space with</p>

		<p>Good open space is needed that provides walking space and seating that is shaded by deciduous trees to allow sun in winter and shade in summer - libraries - community centres, schools , churches are all assets that may bring connectivity, however St. Leonards has none of these.</p> <p>A CITY OF GREAT PLACES The Council idea is to move people close to open space - which will result in overcrowding. Development should be planned with open green space and tree lined streets - and should be done immediately.</p> <p>A WELL CONNECTED CITY The train service in Chatswood, Artarmon and St. Leonards is good, however bus services bringing people to these stations is lacking.</p> <p>JOB AND SKILLS FOR THE CITY Willoughby Council will possibly achieve its aim of maintaining employment in Chatswood as it has in the past encouraged separation of commercial and residential buildings St. Leonards will struggle to reach the high end targets, unless the employment numbers for Royal North Shore Hospital and the Artarmon industrial area is included to reach the target numbers.</p> <p>A SUSTAINABLE CITY An increase in tree canopy coverage in Willoughby LGA. This may be encouraged and assisted in many parts of the LGA, however there are constant applications for trees to be cut down/removed. Artarmon Industrial areas need attractive shade tree canopies.</p> <p>AN EFFICIENT CITY An aim to decrease the amount of waste in landfill and reduce greenhouse gas emissions by the Willoughby community.</p> <p>It doesn't say how this is to be done - however I believe that restrictions should be placed on the level of noise, pollution and heat from air-conditioning and traffic. The need for filters and silencers on air-conditioning to lessen pollution should be put in place by Council and State Government.</p>	<p>the road network, and the future planning of development across the Willoughby LGA, will now be undertaken in line with the principles outlined in the Government Architect NSW and TfNSW Movement and Place framework. Council's Draft Integrated Transport Strategy will develop and implement Movement and Place Plans for all Local Town Centres; Chatswood CBD and the St Leonards Strategic Centre.</p> <p>A WELL CONNECTED CITY Council supports your view in relation to the provision of additional public transport (bus linkages) to the St Leonards rail precinct. Council has listed as an action in its draft Integrated Transport Strategy to:</p> <ul style="list-style-type: none"> • Advocate to TfNSW for improved and increased state infrastructure including: <ul style="list-style-type: none"> - Encouraging increased district / regional bus trips through the provision of enhanced safe bus network and facilities - Relocating bus stops to areas better aligned to cater for access and mobility issues increasing loop bus program a high frequency bus service between Chatswood, Northbridge and St Leonards - undertake feasibility study on double decker buses on key routes and explore infrastructure requirements / issues - implement enhanced bus interchange and wayfinding and directional signage - implementation of smaller buses to service remote areas and streets with narrow access within the LGA as identified
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		<p>A RESILIENT CITY There appears to be no plans in place for a resilient city. As Chatswood is a transport hub, to achieve resilience, employees of all companies and government departments should be encouraged to travel to work on public transport or walk.</p> <p>A CITY SUPPORTED BY INFRASTRUCTURE Needed infrastructure should be constructed by the shared efforts of Council and Government and shared where needed across the LGA. e.g Chandos Street St. Leonards where no money has been spent on beautifying the Willoughby Council side of the road. On the northern side of Chandos Street the pavements could be widened and suitable deciduous shade trees planted to provide a good shade canopy. Each development should be required to remove all old unsuitable trees and replace them with a suitable hardy street tree.</p> <p>URBAN HEAT IMPACTS This is one area that Councils can be proactive. Chatswood has three large planned courtyards. There is insufficient tree cover in all of these areas.</p> <p>Pedestrians should be able to walk along pavements that provide shade in summer, but allow sun in winter. North Sydney Council provides this by allowing awnings on buildings with cut outs on the outer edges to allow for planting of trees - it gives the North Sydney area a far more leafy ambiance.</p> <p>Suburban areas have increasing amounts of hard surface which contributes greatly to the heating impacts of the city. The industrial area should be required to have trees as part of the development approval.</p> <p>Gore Hill Oval has recently been re-developed and although it provides a playground area for children and an outdoor gym these areas are not shaded with no deciduous trees in its surrounds. The new, bigger clubhouse should be situated where the current makeshift clubhouse is situated.</p>	<p>under Council's Movement and place Framework...'</p> <ul style="list-style-type: none"> • Install new bus shelters on high priority local road routes linking Chatswood, Artarmon, St Leonards and Northbridge in Council's Annual Capital Works program over the next 5 years. <p>Each of the above actions provide opportunity and impetus for Council to work with NSW Department of Transport to improve and increase efficiency of bus transport linkages and accessibility to rail station at St Leonards.</p> <p>JOB AND SKILLS FOR THE CITY</p> <p>Comments noted.</p> <p>A SUSTAINABLE CITY Willoughby City Council has recently endorsed Our Green City Plan 2028 which presents how we will achieve environment protection for, and with, our community including waste reduction and reducing carbon emissions.</p> <p>Neighbourhood noise restrictions are regulated by NSW legislation. Council is unable to impose greater restrictions to state legislation.</p> <p>Council's Sustainability Education Team provide information on sustainable transport, hold numerous information activities to encourage our community to engage in active and public transport alternatives.</p> <p>Council is working towards the</p>
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		<p>The walking path surrounding the oval would be advantageous to peoples' health and well-being if covered in a softer covering such as can be seen working beautifully in London.</p> <p>IMPROVING THE EFFICIENCY OF WILLOUGHBY'S BUILT ENVIRONMENT</p> <p>The diagram on page 52 shows non-residential uses most of the energy, produces most waste and greenhouse gas emissions.</p> <p>Are Councils disposing of the waste in the correct manner, and advocating for less packaging or packaging that can be disposed of safely?</p> <p>Recycling information that matches how the Council disposes of the waste should be sent to all residents. This information should be understandable with illustrations and examples as to what goes in which bin.</p> <p>The building codes should state that there should be awnings over all north and west facing windows and adequate eaves on each home building.</p> <p>The development push for higher building towers will necessitate huge amounts of energy. It will become increasingly necessary to keep window closed and use air-conditioning as noise and pollution increases.</p> <p>The Northern Beaches road tunnel is going to greatly affect the residents in the LGA Willoughby Council should be advocating for a rail line - not another unfiltered motor tunnel which will increase traffic.</p> <p>It is also mentioned that a B-line bus route could be established to service the areas between the Northern Beaches and Chatswood. Surely this is a quick fix only and not an adequate manner to fix the problem.</p> <p>Willoughby Council should be assisting its community in advocating for a rail line so that we don't have multiple unfiltered smoke stacks.</p> <p>The debate on Climate Action has been going on for years now. I believe that it is up to</p>	<p><i>Our Green City Target</i> "An increase in urban tree canopy cover on private and public land" from 32% in 2016 to 40% in 2036 in line with North District Plan.</p> <p>Council offers over 100 activities and events for the community each year to help support and encourage behaviour change for sustainability.</p> <p>AN EFFICIENT CITY Willoughby City Council has recently endorsed <i>Our Green City Plan 2028</i> which includes waste reduction and reducing carbon emissions.</p> <p>Neighbourhood noise restrictions are regulated by NSW legislation.</p> <p>A RESILIENT CITY Council's Sustainability Education Team provide information on sustainable transport, hold numerous information activities to encourage our community to engage in active and public transport alternatives.</p> <p>A CITY SUPPORTED BY INFRASTRUCTURE In terms of infrastructure improvements required as part of development consent, Council already has in place, processes that review the amenity and accessibility of footpath areas impacted by development.</p> <p>URBAN HEAT IMPACTS Council is committed to the <i>Our Green City Target</i> "An increase in urban tree canopy cover on private and public land". The</p>
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			<p>available at the Council offices and available on our website. Council offers over 100 activities and events for the community each year to help support and encourage behaviour change for sustainability.</p> <p>A Climate Emergency Declaration was passed by Council on 17 October 2019.</p>
36	Sydney Water	<p>Comments by Sydney Water include:</p> <p>Structure Plan Map Sydney Water commends Council on the inclusion of a clear and effective structure map. Beneficial if sub-catchments and smaller local waterways were also mapped, priorities for catchment-based management.</p> <p>Priority 4 - Support Council's focus on the importance of walking and cycling links and the role of urban water management in supporting irrigation of canopy trees, creating cool, shaded areas for active transport and creating green links between open spaces.</p> <p>Priority 9 - We support Council's aim to create a 'green' walkable CBD. Sydney Water notes the importance of stormwater management and Water-Sensitive Urban Design (WSUD) approaches to achieve this.</p> <p>Priority 12 - Sydney water strongly supports Council's priority in enhancing the health of Willoughby's waterways and Council's suggestion to integrate WSUD in the redevelopment of public land. Best practice WSUD and waterway health targets can also be integrated into planning controls to ensure redevelopment of private land can also assist in addressing waterway health issues. Notes Council's intention to collaborate with stakeholders including Sydney Water on water quality and compliance. It may be useful for Council to consider the receiving water quality in major waterways/adjacent to the LGA such as Lane Cove River and Middle Harbour. It would be beneficial to see Council consider joint approaches to the management of these waterways with other organisations and use</p>	<p>Maps showing waterways, catchments and flood prone areas are included in revised LSPS.</p> <p>Priority 4 – comments noted. Priority 9 – comments noted. Council is currently in concept feasibility design phase for 4 additional WSUD sites within the Chatswood CBD.</p> <p>Priority 12 - Council agree with the need to incorporate best practice WSUD and waterway health targets into planning controls. Controls must be integrated into the detention tanks and detention tank water quality testing per annum by Council, as source of a high amount of pollutants entering the waterway. Private developments should also incorporate WSUD for filtration. Sydney Water has been very responsive to Council in relation to improvements to waterways. Council is currently working with Sydney Water on Scott's Creek Culvert upgrade.</p> <p>Priority 13 - Strong links do exist and have been added in relation to strengthening the links between urban water management (Priority 12) and Priority 13 protecting bushland and biodiversity. This includes</p>

		<p>available frameworks such as the Coastal Management Act 2016. The consideration of receiving water quality is important to enable effective access and recreation of water at beaches, foreshore parks and swimming spots.</p> <p>Priority 13 - As noted from Priority 12 - it would be useful to identify links between urban water management and Priority 13 -Protecting Willoughby's bushland and biodiversity.</p> <p>Priority 14- We support Increasing Willoughby's tree canopy coverage whilst noting the need for reliable water supply to enable trees to provide high levels of evapotranspiration and healthy, shady canopies. There are strong links between Priority 14 and Council's commitments in Priority 12 to integrate WSUD in the development of land -and enable the beneficial use of water that is retained in the catchment.</p> <p>Priority 15 - Sydney Water supports ongoing efficiency-improving requirements for new buildings and developments, such as the increase in the BASIX standard for water efficiency.</p> <p>Priority 19 - Sydney Water commends Council's commitment to identify current gaps in infrastructure and future infrastructure needs to appropriately service population growth. Sydney Water requests that Council continue to regularly engage to provide updates of any changes to projected population, dwelling and employment data.</p> <p>Preparation of Local Environmental Plans - Sydney Water requests Council to consider appropriate land use zoning for water related operational infrastructure. They will provide further advice to Council on appropriate zoning of its infrastructure within the LGA as part of the formal consultation for future amendments to the LEP.</p> <p>Sydney Water requests that the Growth Planning Team is notified when the draft LEP is exhibited.</p>	<p>reference to improving water quality in the Scotts Creek catchment.</p> <p>The key issue affecting the water quality of Willoughby's waterways, as documented by many years of water quality testing is the ongoing discharge of sewerage overflows from 'pop tops' and 'heartlid valves' that typically flow to all the creeklines. Major infrastructure upgrades and maintenance are required by Sydney Water to ameliorate this ongoing problem.</p> <p>Provision and improvement of gross pollutant traps is ongoing in Willoughby and armouring of high scour stormwater outlets has improved visual aspects of water quality but road runoff including rubber particles and hydrocarbons from major State roads in particular needs to be addressed by Roads and Maritime.</p> <p>The largest area of non-Council managed bushland within the LGA is a portion of Lane Cove National Park, where an absence of weed management in the Blue Gum Creek area is degrading the biodiversity values of the adjacent council reserves. Key solutions sit with State agencies.</p> <p>Priorities 14,15,19 – comments noted.</p> <p>Comments regarding further consultation noted and to be taken up as part of the LEP review.</p>
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		Sydney Water looks forward to working collaboratively with Council in finding innovative water management solutions and land use planning strategies to improve liveability, sustainability and productivity outcomes for the local government area.	
37	NSW Health Northern Sydney Local Health District	<p>Housing the City</p> <ol style="list-style-type: none"> 1. Highlight the areas this needs to be addressed on a map. 2. Ensure high density residential developments are within 200m of quality green open space to support neighbourhood interaction. 3. Define 'affordable housing' e.g. essential workers who wouldn't meet social housing criteria, but cannot afford to live in the areas they work. 4. Ensure affordable housing, social housing and higher density residential developments located are within 800m of a train station and/or 400m of a bus stop. <p>A City for People</p> <ol style="list-style-type: none"> 5. Highlight current and future active travel routes on a map. 6. Ensure new and existing neighbourhood designs provide a well-connected street pattern which supports walking and cycling aiming for 400m to 500m (a five-minute walk) between destinations. 7. In accordance with the NSW Premier's Priorities, increase the proportion of homes within ten minutes' walk of quality green, open and public space by ten per cent by 2023. 8. Highlight what the current (and planned) upgrades to local schools will achieve in regard to capacity and how that relates to planned growth. 9. Consider a regional management of sporting fields and associated facilities to assist upgrading, managing and increasing the utilisation of existing sports fields and facilities. Increased accessibility may also be facilitated by public use of recreation facilities not owned by Council (i.e. school ovals) through joint-use agreements. 10. Cluster and co-locate social infrastructure (e.g. libraries, cultural facilities and sporting fields) and green infrastructure (e.g. parks) near public transport. 11. Disperse social housing within new developments and the community in general, 	<ol style="list-style-type: none"> 1. Structure Plan map already identifies housing diversity area. 2. Map to be included showing areas of LGA within 200m and 400m of open space. 3. Affordable housing is not defined by the type and location of dwelling, rather by affordability. If housing expenses are less than or equal to 30% of household income, the housing is considered affordable. 4. This criteria is generally met and is a principle of the Housing Strategy. Maps to be included showing areas within 200m and 400m walkable catchment of centres. 5. Active travel routes are noted on structure plan map. Map showing existing and proposed cycleways to be included. 6. Noted. 7. Noted. Council information indicates that currently 87% of homes are within 400m of defined open space attractors. 8. School upgrades are noted in LSPS. 9. Joint use agreements exist for and more are proposed. 10. Noted and supported. 11. Noted. Council encourages/requires dispersal of social housing in new developments. 12. Existing <i>North District Plan</i> Structure Plan map (Figure 10) and LSPS Structure Plan map shows future eastern transport routes. 13. Noted. Walkable distance is defined as 400m which equates

		<p>ensuring it remains close to public transport.</p> <p>A City of Great Places Council has prepared a <i>Local Centres Strategy 2036</i> which identifies a vision and planning objectives for each of the local centres.</p> <p>12. Highlight these local centres on a map with the current and potential Eastern transport route(s).</p> <p>13. Walkable distance should be defined as 'within a 10 minute walk'.</p> <p>A Well-Connected City</p> <p>14. Advocate for a mass transit system such as a B-Line rapid bus link connecting Willoughby LGA to the Northern Beaches.</p> <p>15. Ensure public transport stops are located in comfortable walking distance (around 400 to 500 metres for bus stops and 800m for train stations) of housing, employment and other local destinations.</p> <p>16. Highlight potential public transport improvements on a map and how they will function.</p> <p>Jobs and Skills for the City</p> <p>17. Define, in greater detail, what is meant by a night-time economy, stating that a vibrant 'night time economy' should <i>not</i> be predicated on alcohol consumption.</p> <p>18. Provide diverse late night attractions such as night markets, lit parks and public spaces.</p> <p>19. Planning controls should support co-working spaces which allow residents who work from home to access meeting and office spaces locally and minimise their commute. Map out the commercial, health and education precinct of St Leonards / Crows Nest.</p> <p>A City in its Landscape</p> <p>20. Map out the current tree canopy of Willoughby LGA.</p> <p>An Efficient City</p> <p>21. Increase Willoughby City's energy efficiency by facilitating changing travel behaviour through sustainable transport. Considerations for the City of Willoughby include increased requirements for electric vehicle charging facilities and decreased requirements for public</p>	<p>to 'within a 10 minute walk' at an average walking pace.</p> <p>14-15. Council has listed as an action in its draft Integrated Transport Strategy to : Advocate to TfNSW for improved and increased state infrastructure including:</p> <ul style="list-style-type: none"> - rapid bus link connecting Willoughby to the Northern Beaches with a terminus at Chatswood (Dee Why to Chatswood) - Encouraging increased district / regional bus trips through the provision of enhanced safe bus network and facilities - Relocating bus stops to areas better aligned to cater for access and mobility issues increasing loop bus program a high frequency bus service between Chatswood, Northbridge and St Leonards - undertake feasibility study on double decker buses on key routes and explore infrastructure requirements / issues - implement enhanced bus interchange and wayfinding and directional signage - implementation of smaller buses to service remote areas and streets with narrow access within the LGA as identified under Council's Movement and Place Framework. <p>16. Transport for NSW monitors and controls all upgrades to public transport. As a result of any action by Council that results in upgrades to public transport, these will be upgraded on Department of Transport webpage. Link can be found at https://transportnsw.info/travel-info/ways-to-get-around/bus#/ :</p>
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		<p>and private car parking spaces, as the car share economy grows and the ownership of private motor vehicles declines.</p> <p>A Collaborative City</p> <p>22. Map the regional recreation facilities and open space that Willoughby City Council, throughout NSROC, has joint use agreements with (e.g. NSW Department of Education), as well as the local facilities.</p> <p>23. Map the Strategic Centres of Chatswood and St Leonards in context with the Eastern Economic Corridor.</p> <p>Measuring Performance</p> <p>'The Pulse of Greater Sydney4' outlines performance indicators developed by the GSC which address healthy urban planning. We understand that the following indicators will be reported through an online dashboard, which align with the 10 Directions.</p> <p>The indicators pertaining to health include:</p> <p>Performance Indicator 2 - 30 minute city Percentage of dwellings within 30 minutes of the nearest metropolitan and strategic centre using the public transport network and/or walking during the morning peak</p> <p>Performance Indicator 3 - Walkable Places Proportion of trips by walking Travel mode to work Access to open space</p> <p>Performance Indicator 4 - Addressing Urban Heat Tree canopy cover in urban area Number of hot days (>35oC) Urban Heat</p> <p>24. We recommend these Performance Indicators be included as a new separate section under Implementation, Monitoring and Evaluation of the LSPS or be incorporated into Section 5. Plan Summary.</p>	<p>This webpage also highlights potential public transport improvements and how they will operate.</p> <p>17-18. The night time economy has been outlined in greater detail under priority 9 of revised LSPS.</p> <p>19. Comments noted and can be considered as part of LEP review.</p> <p>20. Tree canopy map to be included.</p> <p>21. Council has several actions listed in its ITS that address issues relating to increasing Willoughby City's energy efficiency and changing the community's travel behaviour through sustainable transport. These include:</p> <ul style="list-style-type: none"> • Lobby State Government for development and implementation of trial on the use of autonomous buses into and out of the Chatswood CBD. Consider the provision of 'free' power for electric vehicle charging as incentive. This is the highest priority action for accessibility strategy. Several major factors will impact on the delivery of this action including: <ul style="list-style-type: none"> - State Government support - legislation changes - power supply provision • Ensure green power offsets are purchased for EV charging as well as completing investigations into solar power generation. • Investigate and prepare report on benefits of car share participation and car pooling. • Implement 2 electric
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			<p>vehicle (EV) charging stations (which address public safety issues) both on-street and in public car parks per year with the following locations listed for 2020/21:</p> <ul style="list-style-type: none"> - McIntosh Street and Brown Street, Chatswood. Free power to be considered as an option for the EV station users. • Revision of schedule of works program for VPA policy to incorporate sustainable active and public transport options <p>22. Map of recreational facilities and open space to be included.</p> <p>23. Map of the strategic centres in the Eastern Economic Corridor has been included in the LSPS.</p> <p>24. Performance indicators noted and to be considered in future LSPS reviews. Maps showing dwellings within 10 minutes' walk of centres and open space to be included in LSPS. These indicators are currently being reported upon by the GSC through the 'The Pulse of Greater Sydney4' initiative on a District level basis.</p> <p>All parts of Willoughby LGA are located within 30 minutes of a strategic centre by walking/public transport.</p>
38	TBA Urban	<p>The submission is prepared on behalf of the landowners of 168-170 Epping Road, Lane Cove North.</p> <p>A high-level review of the site indicates an opportunity may exist for additional uses beyond its existing single use. These uses may</p>	<p>Submission noted but no change recommended for this area at this stage.</p> <p>In accordance with the <i>North District Plan</i>, the draft <i>Local Strategic Planning Statement</i></p>

		<p>potentially include employment uses such as retail and commercial as well as residential uses.</p> <p>There are an increasing number of contemporary developments in urban locations which provide a range of facilities focused around multiple uses. Permitting flexibility in land use lends itself to better activating urban areas, offering a level of amenity required to support a range of occupiers and stakeholders, and remaining adaptable to changing employment environments.</p> <p>We request that the future role, function and uses of this site be reviewed. It is requested that Council consider this land for mixed uses that contribute towards housing supply within the LGA, as well as providing and growing jobs and delivering other public benefits such as improved landscaping and connections to the waterway.</p> <p>.</p>	<p>and Council’s Industrial Lands Position Paper, Council has indicated an intention to retain and protect industrial land.</p> <p>The land is currently zoned IN2 Light Industrial zone. This area will be considered as part of the Industrial Lands Strategy to be undertaken in 2020. The site is currently occupied by a starch mill which has existed on the site for over 100 years. It is understood that it is due to close in early 2020.</p> <p>A similar LSPS submission has also been sent to Lane Cove Council as part of the site is located in Lane Cove LGA. Consultation has occurred with Lane Cove Council in relation to this site and they support this approach of “retain and manage” industrial land.</p>
39	Environment Protection Authority (EPA)	<p>The EPA provides the comments for Council's consideration which relate to:</p> <ul style="list-style-type: none"> • Air Quality • Noise • Water Quality • Waste and Resource Recovery • Contaminated Land. <p>The EPA has also recently developed the planning guidance notes on:</p> <ul style="list-style-type: none"> • Contaminated Land Management • Waste and Resource Recovery • Air Quality and Land-use Conflicts • Healthy Waterways for Community and Environment Value • Noise and Land-use Conflicts. <p>These notes are intended to assist the Greater Sydney Commission as part of their Assurance process, as well as Councils when developing LSPSs to help deliver key sustainability planning priorities and actions in the District Plans. They include principles, resources, examples and suggested contacts.</p> <p>Any actions to review industrial land would also benefit from recognition and inclusion of supporting approaches to address Action 81 of</p>	<p>EPA comments are noted and have been considered as part of the LSPS review.</p> <p>Hazard maps (bushfire, flooding) are proposed to be included in the revised LSPS. This will highlight areas of limited future development.</p> <p>Active transport: Council promotes and has a number sustainable (active) transport education activities and projects (eg Walk to Work Day was recently promoted). Further initiatives on sustainable transport initiatives are proposed in Council’s draft Integrated Transport Strategy.</p> <p>Comments on related Council initiatives include in the following areas:</p>

		<p>the District Plan.</p> <p>Avoid locating new urban development in areas exposed to natural and urban hazards and consider options to limit the intensification of development in existing urban areas most exposed to hazards.</p> <p>It is suggested Council review the EPA guidance notes to incorporate further content on managing hazards into its final LSPS.</p> <p>The Draft LSPS does not appear to specifically discuss the management of noise, other than some general discussion in relation to the management of amenity and improvements to public domain.</p> <p>The Draft LSPS could provide a mechanism to review these key roadways or transport corridors where future change in traffic growth is predicted. It could also set appropriate noise controls early to guide future development in the vicinity of these transport corridors. Measures to promote use of public transport and low noise transportation modes should also be encouraged. For example:</p> <ul style="list-style-type: none"> • Limit parking where good public transport is available. • Allow easy access by cycling, as well as by walking and public transport. • Provide active transport end-of-trip facilities (bike parking, lockers and showers). <p>To help refine these and waterway health actions in the Draft LSPS, it is recommended that Council review the EPA guidance notes to incorporate further content on managing healthy waterways for community and environmental value.</p> <p>It is suggested that Council review the EPA guidance notes on Waste and Resource Recovery to incorporate further content that strengthen waste-related actions and resource recovery outcomes, into its final LSPS.</p> <p>Further information is provided in the EPA Guidance on Contaminated Land Management which includes information and suggested approaches to help in the development of the</p>	<p>Air quality: Council undertakes sustainable building education on energy efficient heating.</p> <p>Noise: Noise issues and acoustic barriers are considered as part of the broader strategic planning and development consent process.</p> <p>Water Quality: Council currently has regular meetings with Sydney Water on catchment water quality issues. Council currently monitors water quality at ten key sites in our LGA and reports on them annually.</p> <p>Council regularly uses FiltaPave around tree bases, a highly porous product which can filter storm water, slow runoff and is made from recycled waste material.</p> <p>Council promotes sustainable design and building to our community Council will continue to implement water sensitive urban design projects in our Local Government Area.</p> <p>Waste and Resource Recovery: Council has a Repair Cafe and a Community Recycling Centre.</p> <p>Council notes the comments and recommendations made by the EPA in relation to waste. Council is committed to protect existing industrial land currently used for waste management and future resource recovery purposes.</p> <p>Willoughby City Council is currently reviewing its current</p>
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		<p>LSPS.</p>	<p>waste management strategy to ensure best practice in dealing with the community's waste. The EPA's comments and recommendations will be considered as part of the development of a revised waste management strategy. LSPS is to include information on the waste facility at Artarmon and note its district function.</p> <p>Priority 15 Air Quality – Council currently monitors air quality in Artarmon, further data is available on Council's website.</p> <p>Council will continue to lobby the NSW Government to strengthen BASIX and encourage the community to go above and beyond BASIX.</p> <p>Priority 16 Increasing Resilience – Council is aware of its responsibilities in relation to managing both bushfire risk and the management of bushland. This occurs through the Urban Bushland Plan of Management 2014-2019</p> <p>This flow down to individual Reserve Action Plans. These provide information on the condition of the reserve, its history and significance. Issues are identified and proposed actions listed. (Review period - 5 years).</p> <p>Council is part of the Mosman North Sydney Willoughby Bush Fire Management Committee, which assesses and prioritises regional bushfire risks in a Bush Fire Risk Management Plan.</p> <p>Council works closely with Fire and Rescue NSW to implement proposed actions and links</p>
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			<p>these with the Reserve Action Plans and more specific Burn Plans.</p> <p>Council has developed the <i>Our Green City Plan 2028</i> which states its support and contribution to a number of global, federal and state government strategies and goals, including the Paris Agreement. Council's Live Well program encourages our community to take action and get involved with a large number of sustainability education tools, events and programs.</p> <p>Contaminated land – Council is currently developing a policy on contaminated land as per the EPA's advice. This will cover the assessment of DAs and planning proposals where there is the potential for past land use to have contaminated land or there is a change of use to a more sensitive land use.</p>
40	Ethos Urban	<p>The subject site is located at 110 – 120 Christie Street, St Leonards and sits to the east of the train line and the St Leonards Central site.</p> <p>The Land Owners supports the intention for the LSPS to set out a 20-year vision for land use and to identify how growth and change will be managed into the future, and for the LSPS to provide a line of sight to the North District Plan and the Greater Sydney Region Plan. The Land Owners are also supportive of the key objectives of the LSPS.</p> <p>Further actions should be taken in relation to the enhancement of employment land, by ensuring key opportunity sites within the LGA, including the Land Owner's key land holdings, can achieve their highest and best use.</p> <p>3.1 Planning Priority 10: Protecting the role of Willoughby's industrial lands as urban service hubs for the Lower North Shore</p>	<p>Noted. Council has undertaken strategic planning for this area and does not support review of zoning and height on this site at this stage.</p> <p>Council is awaiting the finalisation of the St Leonards and Crows Nest 2036 Plan by DPIE.</p>

		<p>The Land Owners note that the Draft LSPS takes a predominantly ‘retain and protect’ approach towards all employment land within the LGA, as “the loss of these urban services hubs would compromise the local economy and the liveability of nearby suburbs”.</p> <p>The strategic value of employment lands in the area is appreciated, however blanket statements within the LSPS should be avoided, particularly where they would reduce the flexibility to promote innovative solutions and stimulate a genuine mix of uses in appropriate locations, or fail to take into consideration the context, unique surroundings and capabilities of each site. This is especially the case for the Subject Site.</p> <p>The LSPS should encourage a specific master planning exercise for the St Leonards Core and allow more flexible development controls, particularly where they give effect to the goals and aspirations of the LSPS.</p> <p>Council should undertake a strategic review and specific master planning exercise of the St Leonards Core in concert with key landowners; The Draft LSPS should inform rezoning of the Subject Site for B4 mixed uses; and The Draft LSPS should recommend an FSR and Height of Building commensurate with sites to its south – subject to DCP or other controls that respond to heritage interface and other site constraints that come about through the site master planning process.</p>	
41	LEPC9 Pty Ltd Ethos Urban	<p>Submission requests consideration is given to identifying the Channel 9 as a housing diversity area. The draft LSPS Structure Plan Map on page 20 (Figure 1) identifies a number of sites across the Willoughby LGA that are suitable for diverse housing opportunities. These areas are typically already zoned for medium or high-density residential uses, however, do not include areas that are not currently zoned for those uses but which benefit from other approvals that allow for higher-density residential uses.</p>	<p>The Channel 9 site will be included in the housing diversity area on the Structure Plan.</p>
42	Ethos Urban On behalf of Billan Property	<p>Billan Property proposes that: Council should properly consider St Leonards in</p>	<p>The submission regarding 2 Chandos St in St Leonards is noted.</p>

		<p>the draft LSPS, both in terms of its strategic role within the LGA and its capacity to contribute to employment and housing targets.</p> <p>Council should seek to boost housing supply through measures such as allowing mixed-use development in St Leonards, to facilitate a more diverse market within Willoughby LGA and ensure that dwelling completions can meet stated targets.</p> <p>Given population growth may be underestimated in the projections used by Council to set dwelling targets (thereby resulting in a dwelling target that may not meet growth), dwelling targets should be further increased, in line with more recent population trends.</p> <p>Council should seek to accommodate more dwellings than is currently allowed for in the LSPS, in order to help alleviate pricing pressures in the housing market and address unmet demand in the area.</p> <p>Council should denote St Leonards as a significant mixed-use centre in the LSPS, to acknowledge the emerging mixed-use character of the area and the importance of mixed-use development in delivering commercial floor space.</p> <p>Billan Property has aspirations to amend Willoughby Local Environmental Plan 2012 to rezone the site from B3 Commercial Core to B4 Mixed Use and amend the relevant development standards to facilitate a new, mixed-use development. This rezoning would be achieved through a site-specific planning proposal.</p> <p>It is considered that 2 Chandos Street, and St Leonards as a whole, have the potential to meet a number of housing challenges that are likely in the Willoughby LGA over the coming decades, while providing substantial public benefit.</p>	<p>The proposal counters the strategic work carried out by the Department of Planning in relation to the <i>St Leonards Crows Nest Draft 2036 Plan</i> (the Draft Plan). It was concluded that taller buildings be located between St Leonards and Crows Nest Station and on nominated significant sites along the Pacific Highway. There was also a need to protect commercial core zoned sites to ensure employment uses. This approach is supported by Council.</p>
43	Property Council of Australia	<p>The Property Council supports the position taken by Council to use the LSPS as a mechanism for the translation and to give effect to the land-use based strategies identified in Council's Community Strategic Plan, Our Future Willoughby 2028.</p>	<p>All comments are noted.</p> <p>In relation to Priority 5 actions, all actions relating to heritage items/areas listing will include appropriate public notification.</p>

		<p>The LSPS has appropriately identified a range of steps Council must take in planning for the city's future and respond to the Greater Sydney Commission's Greater Sydney Regional Plan and North District Plan.</p> <p>The Property Council looks forward to the release of the Greater Sydney Commission's 6-10 year housing targets later this year and confirmation of the actual housing target number.</p> <p>It is appropriate that future housing development in Willoughby should continue to focus on the need to increase the diversity of housing in the City.</p> <p>In relation to affordable housing, The Property Council request that Council work closely with the GSC to develop a scheme that is determined by uplift arising from planning for new growth and has regard for project viability.</p> <p>The actions identified in the draft LSPS requiring affordable housing to be located along potential eastern public transport routes and the Metro and North Shore Railway lines and for Council owned land to include affordable housing when it is redeveloped for housing purposes are supported.</p> <p>Council will review its local contributions plan every 5 years. The Property Council supports this to ensure that Council is collecting contributions for the right social infrastructure in the right locations. Council's contribution rates should not jeopardise development feasibility and should appropriately apportion the cost of new social infrastructure between the existing community and new residents.</p> <p>In relation to Priority 5, The Property Council supports where Council embarks on any significant review of its listed heritage items or conservation areas to undertake the necessary community engagement for that review.</p> <p>The Council supports the actions under Priorities 6, 7 and 8 relating to planning for local centres and transport.</p>	<p>Priority 9 Chatswood CBD and St Leonards – it is noted that the employment focus of Chatswood CBD and St Leonards and retention of the B3 Commercial Core zone is supported and is a fundamental part of the <i>Chatswood CBD Planning and Urban Design Strategy</i>.</p> <p>Any future LEP and DCP changes will be subject to industry and community consultation during the public exhibition process.</p> <p>Council's development contribution plans have recently been reviewed and adopted following public exhibition. Any future reviews regarding planning agreement policy will be subject to public exhibition.</p>
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		<p>In relation to Priority 9 actions, The Property Council supports the development of Chatswood CBD as a key commercial centre and the focus on employment growth.</p> <p>Initiatives such as protecting the B3 Commercial Core zone and a diverse mix of uses are appropriate to attract commercial uses into the CBD. Council should look at other ways to take advantage of the location's attractiveness for commercial office and retail development and its place within the Eastern Economic Corridor.</p> <p>The Property Council welcomes engaging further with Council on the development of greater detail about how action to develop Chatswood's role in the Eastern Economic Corridor will be implemented.</p> <p>Action 5 under Priority 9 involves Council seeking contributions to provide public and social infrastructure. The Council have a strong interest and would welcome more information about the mechanism Council would employ for its implementation. The concept of base and bonus planning controls provide certainty to landowners and there is general acceptance that they should contribute towards additional physical and social infrastructure in return for higher density.</p> <p>In relation to Priority 10, the preparation of an industrial lands strategy for Willoughby is considered necessary to give effect to the District Plan. .</p> <p>It is important that the viability of St Leonards as a commercial precinct is supported and encouraged into the future.</p> <p>The Property Council supports the proposed actions relating to sustainability and increasing resilience. Where any actions alter planning controls or regulations for the development of land, we welcome the opportunity to comment on those specific changes.</p> <p>Further details of any actions aimed at reducing the energy and water use of new major developments would need to be reviewed and how any implementation plans would interact</p>	
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		<p>with existing requirements for office and residential developments. This includes Actions 1, 5, 6 and 9.</p> <p>Proposals to manage and reduce street and off-street parking to encourage public transport use and car sharing would also need to be reviewed in terms of their implementation and how the transition from current regulations would be developed.</p> <p>The action proposing to review Council's Development Control Plan (DCP) to address sustainable development has in-principle support but we would welcome the opportunity to view more detail and discuss those changes with Council prior to any proposal being exhibited for community consultation.</p> <p>If local planning controls can be employed to achieve minimisation of waste and the re-use or recycling of waste it should be investigated and the costs considered. The Property Council would welcome further discussion of this action when Council has more information.</p> <p>The Council supports the priorities and actions relating to aligning infrastructure with growth and would welcome further discussions on any proposal to review development contributions plans to share any value uplift from changes in development rights. This is a significant issue for our members and we would welcome further engagement with Council regarding this issue.</p>	
44	Lane Cove Council	<p>Council provides in-principle support to the priorities and actions contained in the Draft Local Strategic Planning Statement. However, it is noted that the following actions directly relate to Lane Cove:</p> <ul style="list-style-type: none"> - 'Prepare an industrial lands strategy in consultation with adjoining Councils' and 'Work with Lane Cove Council to support development in the Lane Cove North industrial area' <p>Although the industrial lands in Lane Cove West are shared across both Councils, a consistent strategic approach should be adopted. These actions are, therefore, supported.</p> <ul style="list-style-type: none"> - 'Work with other Councils in the Eastern 	<p>Comments noted.</p> <p>Council will consult with Lane Cove Council during preparation of the Industrial Lands Strategy.</p> <p>Council is keen to collaborate with North Sydney and Lane Cove Councils and State agencies on the future development of the Eastern Economic Corridor and St Leonards.</p> <p>Comments on future centres on Mowbray Road noted. There</p>

		<p>Economic Corridor and NSW Government to refine the role of Chatswood and St Leonards in the corridor, relationship to other centres and supporting infrastructure’ Given that St Leonards does form a part of the larger Eastern Economic Corridor, this opportunity to collaborate is welcomed and supported.</p> <p>- ‘Collaborate with North Sydney, Lane Cove Council, Royal North Shore Hospital, and other State Government agencies to coordinate planning and economic development of St Leonards and the Health and Education Precinct’.</p> <p>Collaboration with Willoughby, North Sydney Councils and other Government agencies on this matter, will continue to occur in relation to St Leonards.</p> <p>Willoughby’s draft Structure Plan map also shows two new future centres for investigation and a green corridor along Mowbray Road. Given that this road forms the Council boundary, further collaboration and detail will be needed.</p>	<p>are no plans to proceed with a future centre in this locality as part of the <i>Local Centres Strategy</i>. Should a future centre be proposed further consultation will occur with Lane Cove Council.</p>
45	Castlecrag Progress Association	<p>Priority 1</p> <ul style="list-style-type: none"> • CPA supports the thrust of this Priority <p>Priority 2 Increasing the supply of affordable housing:</p> <ul style="list-style-type: none"> • CPA strongly supports the setting a target of having 10% of new dwelling floorspace being “Affordable Housing” as soon as is possible, if not immediately. <p>Priority 3</p> <p>It is essential that Flat Rock Creek Corridor not be cannibalized to support construction of an unnecessary tunnel to the Northern Beaches under Middle Harbour. Making walking and cycling a preferred mode of travel CPA supports the action “Increase in number of resident’s journeys to work that do not use a car”. However, the target of increasing the number of such journeys from 49% to 55% is insufficiently ambitious. CPA would hope to see WCC advocate for better public transport to increase public transport usage, and take active</p>	<p>Priorities 1-2 – comments noted. Increasing the supply of affordable housing to 10% of new dwelling floorspace needs to have regard to feasibility. See comments on other submissions on affordable housing (including submissions 28,30,32)</p> <p>Priority 3 – Council has several action listed in its Draft <i>Integrated Transport Strategy</i> (ITS) that address issues associated with improvements and enhancements to walking and cycling connections within Willoughby LGA.</p> <p>Investigate WCC infrastructure and resourcing to improve waterway health e.g. street sweeping – Council is continuing to do this with plans to add additional street sweeping services in Autumn</p>

		<p>measures to increase cycling to achieve much more ambitious targets.</p> <p>It is important that WCC provides secure parking for bicycles at some bus stops and at train stations; and works with NSC to improve commuter cycling routes to North Sydney and the Sydney CBD. In this respect the LSPS has an action 'Expand the bicycle network as planned in the Willoughby Bike Plan'. The Bike Plan should be reviewed to see whether it is sufficiently ambitious.</p> <p>Priority 4: CPA supports the thrust of this Priority but suggests an additional action namely 'Ensure a sufficient supply of free and/or low cost enclosed meeting areas for local community groups'</p> <p>Priority 5: Castlecrag Griffin Conservation Area – Not explicitly mentioned It is essential that attention is paid to the remaining heritage values of this area that was designed by Walter Burley Griffin. Shops on Northern side of Edinburgh Rd – Not explicitly mentioned CPA believes that the shopping strip and street-scape on Northern side of Edinburgh Road be heritage-listed, in order to maintain the character and history of the gateway to Castlecrag.</p> <p>Priority 6: Castlecrag Local Centres Strategy (LCS) The LCS is currently reaching its final stages but there remain significant concerns about Council's intentions regarding the changes to local planning controls, particularly regarding the Quadrangle site.</p> <p>Priority 7: Transport Link to Northern Beaches The development of the Northern Beaches Hospital and other factors mean that the most important transport corridor for the Northern Beaches is the Chatswood to Dee Why link. It is essential that that this link be strengthened as a central priority for either extension of the metro system to Frenchs Forest and/or Dee Why or a trackless tram along the same route as</p>	<p>aimed at areas with non-native deciduous trees.</p> <p>Consider changing gutters to vegetated swales in appropriate areas – where applicable Council aims to achieve this in suitable developments. Council is currently looking to achieve this in carparks at Northbridge, Willis Tennis Centre, Borlaise Street Willoughby.</p> <p>Agreed, to change reference in LSPS from 'Aboriginal leaders' to 'Aboriginal custodians'.</p> <p>Items not specifically mentioned regarding foreshore health, flooding and riparian corridors are supported and these matters are addressed in other Council policies. The following action is however included under Priority 16:</p> <p><i>Complete flood risk management plans for water catchments in the Willoughby LGA, considering risks increased by sea level rise and climate change.</i></p> <p>Priority 13 – comments noted. All bushland reserves are protected and managed by the <i>Urban Bushland Plan of Management (UBPOM)</i>.</p> <p>Priority 14 – comments noted.</p> <p>Priority 15 – comments noted. Council currently monitors air quality in Artarmon, further data is available on Council's website.</p> <p>Council supports strengthening of BASIX which is a State</p>
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	<p>an alternative to a motorway tunnel. This would further enhance Chatswood’s role as a transport hub.</p> <p>Integrated Transport Strategy (ITS) If we are to avoid increasing congestion on road, as population increases, an ITS for Willoughby LGA, be developed and implemented as a matter of urgency.</p> <p>Priority 8: Castlecrag Transport Options The proposed LCS for Castlecrag will fail unless there is efficient and frequent public transport access to and from Castlecrag 7 days a week. This reality must be recognised in the development of an ITS. Action to “Advocate for a high frequency and rapid public transport service between Strategic and local centres on major transport routes” CPA supports this action but we remain concerned that the route suggested leaves Castlecrag unserviced while servicing other areas such as Willoughby Road and Penshurst Street. Instead, CPA suggests a Chatswood – Victoria Avenue – Eastern Valley Way – Sailors Bay Road route.</p> <p>Priority 9, 10, 11: CPA supports the thrust of these Priorities</p> <p>Priority 12 Enhancing the health of Willoughby’s waterways: CPA strongly supports the general thrust of this Priority but believe that it lacks sufficient ambition. We note that some metropolitan councils, such as Parramatta, are proposing a considerable improvement in waterway quality to the extent that it will become possible to swim in the Parramatta River. We see no reason why WCC cannot also aim at some improvement in water quality. To that end we suggest the following: Publish the Water Plan 2018-23 on the WCC website so that the community can review it Include integration of water sensitive urban design in public areas Investigate WCC infrastructure and resourcing to improve waterway health e.g.</p>	<p>Government State Environmental Planning Policy (SEPP).</p> <p>Priority 16 – 20 – comments noted.</p>
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		<p>street sweeping</p> <p>Consider changing gutters to vegetated swales in appropriate areas</p> <p>If workable, change the reference to ‘Aboriginal leaders’ to ‘Aboriginal custodians’ as this is more culturally appropriate.</p> <p>CPA is concerned that actions relating to the following items are missing from the LSPS:</p> <p>Middle Harbour and Lane Cove River foreshores</p> <p>Mangrove and salt marsh health</p> <p>Seawalls</p> <p>Flash flooding impact on waterways</p> <p>Protecting riparian corridors and foreshore from erosion due to excessive wash.</p> <p>Priority 13:</p> <p>Castlecrag Northern Escarpment</p> <p>This Escarpment contains a significant remnant of pre-European bushland within the LGA; it is essential that this bushland be recognised within the LSPS to ensure that future development is not allowed to put it in jeopardy.</p> <p>Sugarloaf Creek Valley & Castlecrag Northern Escarpment; Sailors Bay Creek Watergate Reserve</p> <p>This is an almost unique stretch of remnant bushland only 7 km from the Sydney CBD and 3.5 km from Chatswood CBD. It is essential that any long-term planning strategy explicitly recognises these bushland areas to ensure that nothing, whether by way of new strategic plans or over-ambitious DAs from residents who border the bushland, be allowed that puts this bushland at risk.</p> <p>The Escarpment is also part of an extensive green corridor extending from Upper Middle Harbour through the bushland reserves of Castle Cove, Middle Cove, Castlecrag and Northbridge through to those in North Sydney. All these areas contain pre-European bushland, remnants of indigenous culture and allow for movement of wildlife.</p> <p>We are also concerned that to “Expand community access to bushland reserves” if not done with great care could adversely affect that bushland.</p>	
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46	Urbis on behalf of Mandarin Developments and Blue Papaya	<p>This submission has been prepared by Urbis on behalf of Mandarin Developments and Blue Papaya, in relation to the Mandarin Centre, 65 Albert Avenue, Chatswood.</p> <p>The Mandarin Centre is the third largest retail shopping centre in Chatswood and a substantial</p>	<p>All comments are noted. Council is in the process of reviewing aspects of the Chatswood CBD Strategy including in relation to the area zoned Commercial Core B3.</p>

		<p>contributor to the economy of Chatswood. The Centre is a significant employment generator currently comprising 16,291sqm of Gross Floor Area (GFA) for retail and entertainment uses. In September 2019 the Sydney North Planning Panel (the Panel) resolved to progress a planning proposal for the site which included 16,808sqm of upgraded retail and other business GFA, 11,085sqm of commercial office GFA and 12,060sqm of residential GFA within two towers above a retail podium.</p> <p>The planning proposal which was progressed by the Panel proposed around 70% of the total floor space as retail/commercial which is a demonstrable increase to the amount of retail floor space currently provided within the centre. Based on the endorsed planning proposal the redeveloped Mandarin Centre will generate a total of approximately 1,664 jobs per annum on an on-going basis. This is an increase of 876 additional jobs over the existing centre and translates to between 10.5% and 13.9% of the low to high 2036 job targets for Chatswood within the Draft <i>LSPS</i> and <i>North District Plan (District Plan)</i>.</p> <p>In light of the above, Mandarin Developments and Blue Papaya would like to make the following key comments on the Draft <i>LSPS</i>:</p> <ul style="list-style-type: none"> • We support Council’s recognition of Chatswood CBD as the LGA’s major centre and priority to develop Chatswood CBD as a key commercial centre and integral part of the Eastern Economic Corridor. • As demonstrated by its recently endorsed planning proposal, Mandarin Developments and Blue Papaya is committed to a future mixed use development that will support the job targets for Chatswood as identified within the District Plan. • However, we strongly recommend that the relevant priorities and actions provided within the Draft <i>LSPS</i> be revised to reflect the conditions within the recent partial endorsement of the Chatswood CBD Strategy by the Department of Planning Industry and Environment (DPIE) including; <ul style="list-style-type: none"> – No residential development is to be permitted in those areas of the CBD Core area where this land is located west of the North Shore railway 	<p>The State requirement that the final LSPS be submitted for endorsement by March will be ahead of agreement on any revisions to the CBD Strategy. The LSPS can be revised when those matters are settled.</p>
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		<p>line.</p> <ul style="list-style-type: none"> - That mixed used development can be permitted within appropriate parts of the remaining CBD Core area (i.e. east of the North Shore rail line), but only where this results in demonstrable, significant assured job growth, thereby aligning with the key objective of the District Plan to support job growth. - That the economic feasibility of the minimum 1:1 non-residential floor space requirement within the areas defined as mixed use within the LSPS and CBD Strategy be assessed given the potential impact this may have on the economic viability of the commercial core. <ul style="list-style-type: none"> • We submit that updating the Draft LSPS to reflect the DPIE Partial Endorsement is critical to ensure that all of Council's strategic planning documents are consistent. This is important given that all future planning proposals will be required to demonstrate consistency with both the LSPS and the Partially Endorsed CBD Strategy. <p>It is recognised that provision for commercial land uses is a key priority within the Chatswood commercial core, and also that residential uses contribute to the activity of the Chatswood CBD and benefit the office and retail uses.</p> <p>A local resident population not only provides a core customer base for the Mandarin Centre but also significantly supports an enlivened and active night-time economy within Chatswood.</p> <p>Strongly support given for the recent DPIE endorsement which permits mixed use residential development where it can be proven that it results in significant assured job growth.</p>	
47	Equitibuild Pty. Ltd.	<p>The submission is prepared on behalf of proprietors of commercial buildings in Naremburn being:</p> <ul style="list-style-type: none"> • 292 Willoughby Road; • 294 Willoughby Road; • 296-298 Willoughby Road; <p>a combined land area of approximately 805m².</p> <p>The submitters strongly support the objectives for the Naremburn Local Centre, in particular the fourth scenario (p.43, Draft <i>Local Centres Strategy to 2036</i>). That is, how development can facilitate the public domain, enhancing community amenity and enabling a vibrant, mixed use local centre, supporting a</p>	<p>Community feedback for Naremburn in response to Council's draft <i>Local Centres Strategy</i> was to retain the village feel of the centre. The community generally did not support the proposed 4-5 storeys proposed for Willoughby Rd properties. The final version of the <i>Local Centres Strategy</i> endorsed 3-4 storey with no change to the existing 1.5:1 floor space ratio under WLEP 2012.</p> <p>The <i>Local Centres Strategy</i> will</p>

		<p>day-time economy and providing a broad range of neighbourhood shopping that serves the locals.</p> <p>The built forms proposed in the fourth scenario is very similar to that we have experienced on Military Road, Neutral Bay (North Sydney Municipality). We are very familiar with the cost of construction and design issues arising with achieving viable retail spaces and residential spaces that meet the Australian Design Guidelines. The very local nature of Naremburn, however, poses additional challenges of viability.</p> <p>There is insufficient density and height options proposed to support the public domain space proposed for the Naremburn Local Centre. This will make the necessary amalgamation of individual land lots unlikely and therefore the ability to realise the vision of public domain equally unlikely (or a greater burden to public resources).</p>	<p>guide upcoming changes to the Willoughby LEP and DCP when the community will have another opportunity to comment.</p>
48	Willoughby South Progress Association (WSPA)	<p>The planning for provision of attractive housing options is of vital importance to ensure this vision for housing in the draft Housing Strategy is not corrupted.</p> <p>Comments and feedback provided: <i>Priority 1 –</i></p> <ul style="list-style-type: none"> • <i>Complete and implement the Willoughby Housing Strategy</i> • <i>Review planning controls in the Chatswood CBD and local centres to facilitate delivery of an increased number of medium and high-density dwellings, increasing dwelling diversity in the LGA.</i> <p>WSPA note that the Actions and Strategies referred to above have not yet been finalised so comments are based on the key recommendations made in the draft strategies for Housing and Local Centres while on exhibition and for the updated 'Draft for Consultation' presented to WSPA Executive after community consultation had ceased.</p> <p>WSPA have also reviewed the report prepared by Engage 2. It is noted there was some valid feedback about proposed height changes and density levels and possible negative impacts on</p>	<p>The final version of the <i>Local centres Strategy</i></p> <p>No short-term (>4 year) plans to cover Borlaise Street carpark area. This proposal will be included for consideration in Council's Future (>4 year) Capital Works Program.</p> <p>Priority 7 and 8 - actions outlined in Council's draft ITS advocate to TfNSW for increased bus service north/south along Willoughby Road as well as 'on-demand' services and east-west mini bus/shuttle service for workers/residents.</p> <p>Changes/improvements to on-street parking will be considered as part of Traffic and Transport Study being developed for Local Centres</p>

		<p>the Willoughby South area made by many of the respondents in our area.</p> <p>WSPA is concerned that the proposed zoning changes to 6 storeys would have a very negative effect on the character and feel of Willoughby South Local Centre.</p> <p>The current LEP zoning for Willoughby South already includes large pockets of zones for R3 Medium Density residential as yet still not developed to their full potential. In addition, with the rezoning of Channel Nine to R4 High Density, and a current active proposal to rezone the north side of Walter St to R4 to provide a yield of approximately 200 dwellings, we are of the opinion that zoning with a maximum 4 storey shop top (with a set back for the 4th storey) housing/commercial along Willoughby Rd and the current 2-3 story LEP control along the laneways for our Local Centre is sufficient to provide opportunity for development while protecting the village feel and character of the area.</p> <p>WSPA Executive recognises the desirability for rejuvenation of the Local Centre with improved public domain amenity.</p> <p>WSPA Executive would support the investigation of covering the existing carparking spaces off Borlaise St with a roof which in turn could become public plaza domain space.</p> <p>Priority 7 and 8 WSPA Executive considers there is not enough north/south bus services in the Willoughby South area. WSPA Executive supports the idea of 'on demand' services across the LGA. In addition, we would support the creation of an east-west mini bus/shuttle service for workers/residents from the East corridor (Castle Cove, Middle Cove, Castlecrag, Northbridge to access west to Artarmon: the station, the industrial area and Artarmon/St Leonards commercial areas; in reverse, west corridor can access areas to the East – other Local Centres, Bicentennial Park/Leisure Centre, Artarmon Parklands, Northbridge Baths, Harold Reid Reserve and other green areas located on the waterways. This could be a combination of on-</p>	
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		<p>demand and scheduled services depending on the time of day.</p> <p>WSPA would support the investigation of public parking spaces around the Willoughby South Local Centre to identify improvements and modifications especially in the streets close to Willoughby Rd.</p>	
49	Walter Burley Griffin Society Inc.	<p>The Society requests that more detailed wording in relation to Walter Burley Griffin and Marion Mahoney be included in the relevant chapters of the Local Strategic Planning Statement.</p> <p>The Griffins' Castlecrag is unique. Its very specialised character requires specific and detailed requirements, in order to protect it into the future. The Society requests that the words above are incorporated into the Local Strategic Planning Statement prior to its finalisation.</p>	<p>Comments and proposed LSPS additions noted.</p> <p>The level of descriptive detail proposed is not appropriate for inclusion in the LSPS which is a broad strategic planning document. Further detail in relation to Castlecrag is contained in local histories and can be included as appropriate in the Local Centres Strategy.</p> <p>The following will be included in Chapter 2. : Willoughby's History and Place: <i>In 1920 Walter Burley and Marion Mahony Griffin designed the Castlecrag Estate, as it became known, in sympathy with the natural environment, creating bushland reserves that preserved the major landforms and rock outcrops; foreshore reserves; a delightful network of public walkways; and roads that followed the contours and respected the landforms.</i></p> <p>It is also proposed to add <i>highly</i> valued and protected to the LSPS Vision</p>
50	Keneco Property Artarmon	<p>This submission specifically relates to land currently owned by Keneco Property and operated as a Kennards Hire, which specialises in providing a wide range of rental equipment and tool hire.</p> <p>The site has an approximate area of 8,108m² is known as 16-18 Herbert Street, Artarmon and is located on the corner of Cleg Street and Herbert Street, Artarmon.</p>	<p>The site 16-18 Herbert Street is currently zoned IN1 General Industrial.</p> <p>In accordance with the <i>North District Plan, the draft Local Strategic Planning Statement</i> and Council's Industrial Lands Position Paper Council has indicated an intention to retain</p>

		<p>Keneco supports and encourages new housing in areas close to services, facilities and public transport. It is recommended that provision is also made for commercial and retail opportunities close to new housing to support a 30-minute city as advocated in the Greater City Region Plan and providing improved accessibility through the Eastern economic corridor.</p> <p>Consistency between the Draft LSPS and Draft St Leonards and Crows Nest 2036 (Department of Planning, Industry and Environment) is vital given that both plans establish the strategic direction for the next 16 years.</p> <p>Keneco supports the establishment of enhanced transport systems whether at a local level or broader context. Increased connectivity ...will ensure local residents will have ample transportation options contributing to the 30-minute city concept for Sydney.</p> <p>Keneco generally supports the priority for the protection of Willoughby's industrial lands as urban service hubs for the Lower North Shore.</p> <p>As per Keneco submission to the Draft St Leonards and Crows Nest 2036 (Department of Planning, Industry and Environment) it is recommended that the proposed boundary of the 'no change' area of the Artarmon Industrial area be revised to allow for an intensification of employment uses.</p> <p>The intensification of the Artarmon area for employment uses would aid the economic development of the area as well as contribute to the health and wellbeing of the community.</p> <p>Consistency between the Draft LSPS and Draft St Leonards and Crows Nest 2036 (Department of Planning, Industry and Environment) is vital given that both plans establish the strategic direction for the next 16 years. It is recommended that the submissions to the Draft St Leonards and Crows Nest 2036 be reviewed by Council to ensure comments raised correlate with Council's LSPS.</p>	<p>and protect industrial land.</p> <p>This area will be further considered as part of the Industrial Lands Strategy in 2020 to inform the new LEP/DCP provisions.</p>
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51	Lynne Saville	<p>Comments provided by Cr Saville:</p> <ul style="list-style-type: none"> • Renewable energy targets 100% by 2050. • Reduction in GHG 50% by 2025. • Green grid increase green cover native vegetation by 40%. • Water increase water recycling, water reuse within catchment recycling, water sensitive urban design, water re-use. • Retain industrial areas in totality for future employment. • Increase open green space in form of reserves eg dive site corner Pacific Highway, Mowbray Road, opportunity to capture open space for development remnant Blue Gum High Forest, community food gardens/edible landscape as well as for local new school. 	<p>Comments Noted.</p> <p>The current <i>Our Green City Plan 2028</i> contains Council's currently endorsed targets.</p>
52	Heritage NSW Department of Premier and Cabinet	<p>Heritage NSW congratulates Council on the approach to heritage and culture in the LSPS. Areas for Council to consider when finalising the LSPS include:</p> <ul style="list-style-type: none"> • Consider how Aboriginal cultural heritage and cultural landscapes can be protected in the LEP. • Consider the linkages between culture, heritage, tourism and economic growth. • Further articulate heritage as it relates to the character of the city. • Consider the linkages between actions and priorities, including how heritage and culture contribute to an attractive and liveable city. <p>Heritage NSW records show that the Willoughby local government area contains 11 State Heritage Register items and 122 Recorded Aboriginal Sites</p>	<p>Comments and suggestions noted.</p> <p>The revised LSPS includes additional reference to scenic landscapes, heritage management and protection, Aboriginal heritage and cultural diversity and activities in the LGA.</p>