

Attachment 3: Willoughby Environment Protection Association (WEPA) Submission and Council responses to the draft Willoughby City Council *Local Strategic Planning Statement* – draft document for public consultation (October 2019)

| Draft LSPS Priority & Actions | WEPA suggestions/amendments: | WEPA comments: | Council Comments |
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| Priority 3 Enhancing walking and cycling connections to Willoughby's urban areas, local centres and landscape features | | | |
| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | |
| Develop both east-west and north-south routes in the LGA as green links for walking and cycling. | | WEPA appreciates that Willoughby LGA has good bike paths. | Noted. |
| Expand the bicycle network as planned in the Willoughby Bike Plan. | | WEPA does not support the use of bicycles on bushland reserves. | Noted. There are no short to medium term proposals listed in Council's Bike Plan that intends to install shared pathway through bushland reserve. Any consideration to install cycle route impacting on bushland reserve will include, as part of the planning and development phase, the appropriate environmental impacts statements (EISs). This will ensure risks to natural vegetation/flora, fauna are minimised. |
| Work with Transport for NSW to address barriers to walking and cycling caused by major transport | Work with North Sydney Council to improve commuter cycling routes between Willoughby and the Sydney | | Noted. Council Officers to work with North Sydney Council on the development |

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| <p>corridors such as the Pacific Highway, Gore Hill Freeway and North Shore Rail Line.</p> | <p>CBD.</p> | | <p>of cycling projects listed in Council' Bike Plan that connect the two LGAs.</p> |
| | <p>Add action: Protect connectivity of Flat Rock Creek Corridor by opposing NSW State Government plans for an unnecessary and unwanted car tunnel to the Northern Beaches.</p> | <p>This Priority makes mention of Green Corridors and, in particular, the Flat Rock Creek Corridor which is threatened by the long-term major works proposed by the NSW State Government.</p> | <p>Noted. Council to submit notification to Department of Transport highlighting residents' concerns.</p> <p>The priority is to minimise impact from any infrastructure project particularly on the restored and revegetated areas.</p> |

| Draft LSPS Priority & Actions | WEPA suggestions/amendments: | WEPA comments: | Council Comments |
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| Priority 4 Ensuring that social infrastructure caters to the population's changing needs and is accessible to foster healthy and connected communities | | | |
| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | |
| | <p>Add action: Retain and reuse existing buildings wherever possible for local meeting places. Where a need is identified by the community, create local meeting places which provide free and/or low cost, enclosed meeting areas for community groups.</p> | <p>WEPA is particularly concerned with the process undertaken and eventual decision taken in relation to the demolition of the Artarmon Bowling Club. Any replacement structure should make provision for enclosed space for the community groups wishing to meet there.</p> | Noted. |
| | <p>Add action: Maintain and reinvigorate Council's voluntary advisory committees which are made up of residents who wish to contribute local knowledge and expertise to the development of social infrastructure.</p> | | Noted. |
| Priority 5 Respecting and enhancing heritage | | | |

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| and local suburban character | | | |
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| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | Council Comments |
| | Add action: Change planning controls to ensure high rise buildings do not directly abut heritage areas and items. | | Council is in the process of reviewing the proposed controls for the B4 Mixed Use zone within the CBD Strategy, with particular regard to built form and the interface with surrounding heritage areas. |
| | Add action: Appoint full-time History Officer – charged with promoting the heritage and history of Willoughby City. | Positions such as this work to include people and culture (not just architecture) in the understanding and protection of heritage and local suburban character. | Increasing community engagement with cultural and natural heritage is desirable and encouraged by Council. Council's library provides links to the history of Willoughby LGA and related resources on the website at the following link. http://www.willoughby.nsw.gov.au/library/history-at-willoughby/ |
| Priority 7 Developing Chatswood's role as a true transport hub for Willoughby and the North Shore; Priority 8 Connecting Willoughby's network of centres with each other and to Greater Sydney by mass transit | | | |

| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | Council Comments |
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| <p>Advocate for a mass transit system such as a B-Line rapid bus link connecting Willoughby to the Northern Beaches with a terminus in Chatswood.</p> | <p>Amend action: Advocate for a mass transit system <i>utilising more flexible and effective alternative technologies (eg trackless trams)</i> connecting Willoughby to the Northern Beaches with a terminus in Chatswood as a <i>top transport priority</i>.</p> | <p>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.</p> <p>Development of this link would negate the need for the Beaches Link Tunnel.</p> | <p>Council has listed as an action in its <i>Integrated Transport Strategy</i> to :</p> <p>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 |

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| | | | <p>buses to service remote areas and streets with narrow access within the LGA as identified under Council's Movement and Place Framework.</p> <p>16.NSW Department of Transport (formerly 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> <p>This webpage also highlights potential public transport improvements and how they will operate</p> <p>20. Tree canopy map will 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</p> |
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| | | | <p>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 two electric 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: |
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| | | | <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 |
| Develop an integrated transport strategy for the LGA, including Chatswood. | Amend action: <i>As a matter of urgency, develop an integrated transport strategy for the LGA, including Chatswood.</i> | The planned development and increase in population and the further impact this will have on traffic congestion makes this an urgent priority. | Integrated Transport Strategy currently being developed for Willoughby LGA. Planned exhibition and completion early 2020. |
| Priority 12: Enhancing the health of Willoughby's waterways | | | |
| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | Council Comments |
| Implement the Willoughby Council Water Plan 2018-23. | Add: The LSPS should include the major aims of the Water Plan and/or a link to the Plan. | Please publish the Water Plan on the website so the public can review it. | The Willoughby Water Plan 2018-23 is an operational document and is still in draft form. Parts of the plan can be shared if requested. |
| Embed elements of water sensitive urban design in development to improve waterway health. | Amend action: Embed elements of water sensitive urban design in <i>development and in public areas</i> to improve waterway health. | | Amendment supported. Water sensitive urban design (WSUD) is being incorporated into multiple projects this year and will be integrated as a design choice where applicable in future works. |

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| <p>Collaborate with stakeholders, such as Sydney Water, EPA, Sydney Coastal Councils Group and the community to identify major causes of water quality pollution to ensure compliance.</p> | <p>Add action: Investigate council infrastructure and resourcing to improve waterway health eg street sweeping.</p> | | <p>Council is continuing to do this, including plans to add additional street sweeping services in Autumn aimed at areas with non-native deciduous trees.</p> |
| | <p>Add actions covering:</p> <ul style="list-style-type: none"> - Middle Harbour and Lane Cove River foreshores - Mangrove, sea grass and salt marsh health - Sea walls - Flash flooding impacts on waterways - Protecting riparian corridors and foreshore from erosion and excessive wash - Consider changing street gutters to vegetated swales in appropriate areas. | <p>WEPA is concerned about the potential impact of the Beaches Link Tunnel on Middle Harbour. There are risks for the community who wish to swim at baths and other points along Middle Harbour, threats to endangered sea grasses and aquatic species and pollution risks for the Flat Rock Gully waterways and Long Bay from the proposed dive site construction and tunnelling.</p> | <p>The objectives of Council's Urban Bushland Plan of Management (UBPOM) and water strategy incorporate these actions.</p> |
| <p>Acknowledge, protect and celebrate cultural heritage associated with local waterways by engaging with Aboriginal leaders in the planning, design and implementation of actions in relation to waterways and their surrounds.</p> | <p>Amend: Suggest wording be changed from "leader" to "<i>custodian</i>".</p> | <p>WEPA supports this action (see further comments at the end of the table relating to the widening of this strategy).</p> | <p>Amendment supported and LSPS has been amended.</p> |

| Priority 13 Protecting Willoughby's bushland and biodiversity | | | |
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| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | Council Comments |
| Continue to review and implement the <i>Willoughby Council Urban Bushland Plan of Management</i> to maintain biodiversity and maximise the value of bushland as part of the natural heritage of Willoughby. | Add: names of significant bushland areas to these actions to ensure that they are protected from future development. | WEPA supports the continued implementation and review of the UBPM. | All the reserves are listed in volume 2 of the UBPM (Inventory). |
| | Add action: Identify biodiversity corridors and improve habitat protection, enhancement and connectivity within and beyond the city through planning controls and Council works programs. | Protection and further development of biodiversity corridors is essential to protect wildlife and vegetation in the Willoughby city area. Importantly, this includes trees and vegetation on private property as well as Council-maintained trees. | Agreed, the UBPM and the Reserve Action Plans incorporate these elements |
| | Add action: WCC to prepare a biodiversity strategy to inform wildlife corridor planning and protection measures across the landscape which is complemented by Council's proposed Vegetation Management Strategy (VMS). | Willoughby has a complex and valuable range of wild species and, includes some of the most critically endangered wildlife, plants and ecological communities in NSW. This unique biodiversity in urban areas is severely depleted and bushland continues to be | No change recommended. This action is currently incorporated in the <i>Our Green City 2028</i> and the biodiversity chapter of the UBPM. |

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| | | <p>removed. It is important to understand and retain what is remaining and improve wildlife habitats and corridors. Future planning should use benchmarking studies and a restorative approach.</p> <p>There must be a recognition of priority biodiversity sites and species which are protected and where development or offsets should not occur. The ability of some wildlife to persist in small pockets and expand into restored habitat, such as Flat Rock Gully, indicates the importance of these areas.</p> | |
| Protect high value ecosystems in the private domain through planning controls to enhance biodiversity and protect environmental values. | Add action: Complete and maintain the natural heritage register and register of significant trees. | | The current data is still in use, updating the register involves a significant investment of time. |
| | Add action: Maintain existing biodiversity and increase vegetation and habitat opportunities in relation to new development. | | Supported, however is extremely difficult to achieve given increased densities. |
| Expand community access to bushland reserves, having regard to ecological values, | Amendment: Expand community access to bushland reserves, having regard to protection of ecological values, including | Implementation of this initiative includes the need to protect existing bushland reserves such as Flat Rock | Amendment supported. No change required in LSPS. |

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| including biodiversity and important marine environments. | biodiversity and important marine environments. | Gully from inappropriate development such as the proposed Beaches Link car tunnel. WEPA also notes the pressures of encroachment of sporting fields, lighting, walking etc on adjoining bushland areas and would like to see confirmation that there will be no net loss of bushland. | |
| | Add action: Advocate for the protection and enhancement of bushland and biodiversity in NSW Government projects. | | Additional action supported and included. |
| | Add action: Prepare a policy on protecting bushland areas from inappropriate light pollution. | Leave wild, dark and quiet places in the LGA for the benefit of wildlife. | A draft strategy on this issue is being prepared by Council. |
| | Add action: Prepare an urban forest strategy and urban forest management plan. | Prioritise the inclusion of local indigenous species to support habitat and biodiversity | This matter is being addressed by Council's proposed Vegetation Policy and Vegetation Guidelines in addition to the Urban Bushland Plan of Management (UBPOM). |
| | Add action: Increase the number of wildlife protection areas. | | High priority areas are included in the UBPOM with a review of other sites underway. |
| | Add action: Consider the establishment of a Native Havens program, such as that run by North Sydney Council, whereby Council provides support and education to private residents to establish native vegetation on | | WCC already has the Bush-friendly Backyards program, similar to North Sydney's program. Here's a link: http://www.willoughby.nsw.gov.au/environment--sustainability/bushland--wildlife/wildlife/bush- |

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| | their property. | | friendly-backyards/ |
| | Add action: Better enforce off leash / on leash laws and potentially exclude dogs from bushland reserves where dog owners are repeatedly flouting regulations about leashing dogs. | Insufficient regulation of these laws is having a noticeable impact on wildlife in these areas including attacks by dogs on wallabies and other animals which are attempting to recolonize our bushland areas. | Noted. Rangers patrol this. |
| | Add action: Commence community consultation on the containment of cats, particularly those near wildlife protection areas. | WEPA notes that numbers of other councils have begun to address the problem of domestic cats wandering at night and killing wildlife in protection areas. Failing to contain cats also has major impacts for feline health and well-being. | This consultation has commenced and will continue. |
| | Add action: Council to consider identifying additional areas as 'environmentally sensitive areas' to protect them from loss of canopy and other environmental values due to complying development. | Examples of how to achieve this are below: Part 3 Exempt and Complying development Clause 3.3 comprises compulsory clauses that identify environmentally sensitive areas that are excluded from the <i>SEPP (Exempt and Complying Development Codes) 2008</i> . A direction of the clause states " <i>Additional areas may be added to this list</i> ", allowing | Supported in principle but would require further consideration. |

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| | | <p>for areas identified as endangered ecological communities or threatened species habitat for instance, to be mapped in the LEP as 'environmentally sensitive areas' and / or listed under clause 3.3.</p> <p>Precedents include:</p> <ul style="list-style-type: none"> • Hunters Hill LEP 2012 River Front Area Map that incorporates privately owned land • Randwick LEP 2012 biodiversity values map, however it is largely in public ownership or within golf courses • Campbelltown LEP 2015 includes <ul style="list-style-type: none"> a) land within 40 metres of the top bank of a waterway or artificial waterbody, b) land that has a gradient exceeding 16%, c) land that is in Zone E2 Environmental Conservation • Penrith LEP 2010 includes a) land in Zone E1 National Parks and Nature Reserves, Zone E2 Environmental Conservation, Zone W1 | |
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| | | <p>Natural Waterways or Zone W2 Recreational Waterways, b) land on the Natural Resources Sensitivity Land Map', c) land near the river or in the riverine corridor, wetlands or conservation areas sub catchments, within the meaning of Sydney Regional Environmental Plan No 20— Hawkesbury-Nepean River (No 2—1997)</p> <ul style="list-style-type: none"> • <u>Canada Bay LEP 2013</u> includes land that is in Zone E2 Environmental Conservation as well as land identified as “Environmentally Sensitive Land” on the Environmentally Sensitive Land Map that includes some privately owned land along the foreshore, • <u>Sutherland LEP 2015</u> lists the following maps as indicating ‘environmentally sensitive land’ instead of listing the maps under clause 3.3 a) Natural Landform, b) Riparian Lands and Watercourses, c) | |
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| | | <p>Terrestrial Biodiversity</p> <p>Similarly, heritage maps can be used to protect green infrastructure values as natural, aesthetic, scientific or cultural values, as defined by the <i>Heritage Act 1977</i>.</p> | |
| | <p>Add action: Include maps in the LEP that are based on in-depth research and provide a good indication of a land's natural values and its role in the landscape, not only its land use zone.</p> | <p>eg Sutherland LEP 2015 Terrestrial Biodiversity Map or <i>Ku-ring-gai LEP 2015</i> Riparian Lands and Water Courses Map that identifies category 1-3a watercourses.</p> | <p>Council uses OEH ecological mapping. Further ecological mapping in LSPS is being considered for the final LSPS.</p> |
| <p>Priority 14 Increasing Willoughby's tree canopy coverage</p> | | | |
| <p>WCC Actions:</p> | <p>WEPA suggestions/amendments:</p> | <p>WEPA comments:</p> | |
| <p>Complete an audit of street trees and identify any resulting opportunities to increase tree canopy in footpaths, public spaces and alongside roads.</p> | <p>-</p> | <p>WEPA strongly endorses this action. In relation to street plantings WEPA suggests that Council plant the largest tree possible in the location to ensure canopy coverage. It should also consider bush fire prone areas and sensitive bushland when selecting species. There is a need for succession planting and a variety of species for resilience.</p> | <p>Support noted. An audit of street trees is currently underway. This is also identifying opportunities for new plantings.</p> |

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| <p>Complete and implement a city-wide vegetation management strategy.</p> | <p>Amend action: Complete and implement a city-wide <i>Urban Forest Strategy which prioritises the protection of and increase in canopy cover and vegetation across public and private land by:</i></p> <ul style="list-style-type: none"> a) <i>maintaining existing canopy cover and vegetation and implementing additional canopy cover and vegetation in new developments</i> b) <i>reviewing targets and controls for tree canopy cover on private land with the aim to increase tree canopy eg ensuring the retention of deep soil areas and adequate setbacks to allow plantings along streets</i> c) <i>identifying opportunities for shrubs, grasses and other native vegetation to be planted in road reserves and other public places</i> d) <i>advocating for the protection of and increased canopy cover and vegetation in NSW Government projects</i> e) <i>collaborating with the NSW and Australian Governments and others to minimise the impacts of infrastructure on canopy cover and vegetation.</i> | <p>WEPA notes that the term Vegetation Management Strategy is not in common usage in other LGAs. A better indication of the benefits of trees on both public and private land and which highlights the undoubted need to identify ways to enhance the urban canopy would be better conveyed by the term 'Urban Forest Strategy'.</p> <p>WEPA would like to remind Council that the VMS needs to comply with the Metro plan and District plan about expanding canopy cover, having large canopy trees to improve urban heat issues and supporting biodiversity as well as scenic landscapes wherein large trees play a fundamental part.</p> | <p>Comments noted. The State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 (Vegetation SEPP) refers to Vegetation Management.</p> <p>Vegetation Management Policy, guidelines and DCP are currently on exhibition.</p> <p>The proposed Vegetation Management DCP requires an replacement ratio of 3:1 (ie 3 replacement trees for every 1 removed, on public and private land)</p> <p>Identifying opportunities for shrubs, grasses and other native vegetation to be planted in road reserves can be done as part of Landscape Improvement Plans and Masterplans.</p> <p>In relation to establishment of a native nursery there are existing nurseries that can provide stock sourced from local seed collections.</p> <p>In relation to inclusion of a green grid map, it is noted that Green Corridors are shown on the LSPS structure plan map. These include both north-south and east-west (river to harbour) links. Further detailed provisions for these links would need to be agreed with Streetscape and Parks teams.</p> |
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| | <p>f) <i>Implementing community education programs about the benefits and risk level of trees</i></p> <p>g) <i>consider provision of free aborist advice to residents in relation to existing and proposed tree plantings.</i></p> <p>h) <i>establishment of a native nursery to provide local indigenous plants for plantings on public and private land; support a Native Havens program and to encourage landscapers to use local native plants in their landscaping.</i></p> <p>h) <i>in addition to an active street frontages map in the LEP, council could include a green grid map that indicates walkability across the landscape. This could be associated with clauses in the LEP and DCP that enforce landscaping, deep soil areas and setbacks along the green grid to ensure canopy trees and shade in the longer term.</i></p> | | |
| <p>Protect existing trees in the LGA through planning controls, and require all developments</p> | <p>Amend: “mature trees” to read “<i>plant large canopy trees</i>”.</p> | <p>Adequate setbacks and deep soil areas are fundamental to facilitating retention/establishment of</p> | <p>Comments noted and supported.</p> |

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| <p>to retain existing trees and plant mature trees where appropriate.</p> | | <p>trees. Areas in the CBD with no setbacks are just paved and restricted from accommodating vegetation. Future development in the CBD should require setbacks to enable the inclusion of appropriate landscaping eg as at the top end of Help Street Chatswood on the Roseville side.</p> | |
| | | <p>Opportunities to further support green infrastructure: currently the DPIE is seeking feedback on a new approach outlined in <i>Discussion Paper – Local Character Overlay</i> for an optional local character map and associated clause identifying character areas in LEPs.</p> <p>These areas would be based on local character statements either in an LSPS, DCP or a standalone document. “The overlay would sit within standard instrument local environmental plans and would provide a legal mechanism for introducing additional character assessment requirements for development applications or</p> | <p>Comments noted. WCC to consider providing feedback on DPIE’s discussion paper on “Local Character Overlay”. Tree canopy map to be included.</p> |

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| | | <p>to exclude certain land from certain complying development or provide alternative requirements”.</p> <p>Council is encouraged to consider this initiative as it will be able to set character expectations that include the need for green infrastructure. However, as these areas will not cover the whole LGA, other tools will be required for a broader application of green infrastructure.</p> <p>Part 2, 2.3 Zone objectives LEP Template</p> <p>Direction 1 states <i>“Additional objectives may be included in a zone at the end of the listed objectives to reflect particular local objectives of development but only if they are consistent with the core objectives for development in the zone as set out in the Land use table”</i>.</p> <p>Liveability outcomes from green infrastructure which relate to reduced urban heat for instance, could meet Direction 1 requirements for most zones.</p> | |
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| | | Although urban heat island, Green Grid and tree canopy maps do not yet exist in LEPs, the Office of Environment and Heritage maps and Government Architect maps will greatly assist Council in preparing map layers in Willoughby LEP on these matters, unless included in DCPs. | |
| Encourage green roofs or green nature walls and green buildings, particularly in the Chatswood CBD and St Leonards. | <p>Add actions: Consider mandatory green walls and roofs in strategic locations where urban heat or biodiversity corridors are important.</p> <p>Add action: Undertake a review of provisions and policy for the introduction of trees in Chatswood industrial areas with consideration of whether or not tree plantings and/or other green infrastructure be mandatory.</p> | | <p>Council is currently creating a database on street trees and potential space for plantings</p> <p>The Vegetation Management Policy and Guidelines is currently on public exhibition. The Policy brings together existing items including: Urban Tree Policy and Street Tree Masterplan.</p> <p>The industrial areas is an identified area for priority tree planting.</p> |
| | <p>Add action: Undertake a review of Council policy of replacing natural grass turf which is cooler and provides an ecosystem for wildlife with artificial turf in local parks given the high level of heat generated by this material and its contribution to the urban heat island effect.</p> | There is increasing research on the use of artificial turf which highlights its role in increasing the urban heat island effect, particularly burns, dispersing microplastics into the environment and local bushland and waterways and its health impact on those | <p>Comments noted. Also have to consider community social/health priorities and the need for increased artificial playing surfaces to accommodate a growing population.</p> <p>There is a regional sportsground strategy that covers provision of synthetic playing surfaces.</p> |

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| | | playing on these surfaces. | |
| Priority 15 Improving the efficiency of Willoughby's built environment | | | |
| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | |
| Develop Chatswood as a low-energy, low-carbon, low-water use centre, particularly through proposed major developments. | Add action: Advocate to the State Government for uniform standards for recycling. | | Comments noted. |
| Facilitate a transition towards a more sustainable transport system through improved mass transit services, active transport corridors and new technology such as electric vehicle charging stations. | - | See comments under Priority 7 above | Listed as actions in Council's ITS include: Implement trial of MaaS in Chatswood CBD in conjunction with the program currently being trialled by TfNSW across Sydney. Trial to take into consideration a shared bike system. |
| Facilitate the shift towards a more autonomous future with the uptake of electric vehicles (EVs) and automated vehicles (AVs), through identifying potential impacts and appropriate | - | It should be noted that any future adoption of electric vehicles is only partially likely to address pollution concerns as, according to the RMS 50% of vehicular particulate pollution is not related to combustion (eg comes from wheel and vehicle part friction) and, according to | Listed as actions in Council's ITS include: Ensure green power offsets are purchased for EV charging as well as completing investigations into solar power generation. Implement 2 electric 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: - McIntosh Street and Brown Street , |

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| <p>planning.</p> | | <p>other sources, this figure is over 60%.</p> | <p>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. Undertake a review of both on and off-street parking rates, as part of fees and charges schedule, to incentivise EV, off peak utilisation, car sharing facilities at existing and proposed EV charging stations.</p> |
| <p>Manage and reduce street and off-street parking to encourage public transport use and car sharing and limit growth in travel by private vehicles.</p> | <p>Add action: Introduce more sustainable options for road surfaces than traditional crude oil-based asphalt.</p> | <p>Ku-ring-gai Council has been turning waste into useful by-products such as road asphalt and bitumen. It is trialling two types of asphalt made from up to 35% recycled waste including plastic bags, glass and green waste. The 'Biogenic' asphalt blends processed organic substances such as green waste to produce part of the asphalt. Saiala Road, Killara has been the first trial site and is responding well to normal traffic flows.</p> | <p>Investigate and prepare report on benefits of car share participation and car pooling. Council has met with Downer relating to trialling Reconophalt product. Awaiting EPA approval for product before further applications are made. Staff will investigate the Biogenic product mentioned in this submission.</p> |
| <p>Advocate for increased energy and water efficiency standards for new buildings including Green Star certification and the BASIX standards.</p> | | <p>WEPA strongly supports this action.</p> | <p>Noted.</p> |

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| Review Willoughby Council's Development Control Plan to address sustainable development. Ensure that local planning controls encourage the minimisation of waste and the re-use and recycling of waste where possible. | Add action: Investigate the Penrith system for dealing with putrescible waste. | | Willoughby City Council is currently reviewing its current waste strategy to ensure best practice in dealing with the community's waste. Council is also investigating the most appropriate putrescible waste outcomes for our LGA. The Willoughby DCP contains controls on waste management in relation to new development and redevelopment proposals. |
| Require increased energy and water efficiency in major development proposals where increases in density or yield are sought. | Add action: Consider a policy on increasing access to solar power. | | |
| Priority 16 Increasing resilience to climate change, extreme weather and other shocks and stresses | | | |
| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | |
| | Add action: Declare a Climate Emergency. | Declaration required to ensure a prioritised and integrated response to the threats and challenges of climate change and to alert the community to its implications. | Climate Emergency Declaration was passed by Council on 17 October 2019. |

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| | Add action: Resuscitate the WCC Emergency Plan developed after the 1994 bushfires and update if necessary. | | The “Willoughby/Lane Cove Local Emergency Management Plan 2017” is the current emergency management plan (EMPLAN). The EMPLAN is endorsed by the North West Metropolitan Emergency Management Committee. |
| Employ a Resilience Officer to develop and implement a Resilience Plan for Willoughby in collaboration with Resilient Sydney. | - | WEPA supports the employment of a resilience officer to undertake these works. | Noted. |
| Priority 17 Augmenting local infrastructure to accommodate planned growth | | | |
| WCC Actions: | WEPA suggestions/amendments: | WEPA comments: | |
| Regularly review the development contributions plan to ensure that service standards in the LGA will be maintained as the population grows. | Add action: Include development controls to create sporting facilities on the roof tops of or within new commercial or high-rise buildings to take pressure off existing ovals. | | Additional action noted but considered too specific for the LSPS. This initiative can be considered at the development stage for suitable proposals. |
| Maintain current service levels of social and physical infrastructure so that liveability does not decrease as | Add action: Work with other local councils to gain the support of the State Government to introduce shared access to private sports fields in lieu of the exemption held by private | Currently Council forgoes rates on sports fields owned by private schools (which are Government-funded and tax exempt). | Noted. There are only 2 private schools in the LGA with sportsgrounds: St Aloysius (1 field at Tyneside Ave), and Shore at Northbridge (5 fields). As these fields do not have floodlights they would be of limited use to Council when the high demand occurs in the winter sports |

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| development occurs. | schools from the payment of rates in the LGAs where they are located. | Council has identified through NSROC research that there is a short-fall in available sports fields which is likely to grow as the local population increases. | season. Council is endeavouring to optimise the capacity of each public sportsground in the LGA by upgrading drainage and irrigation, renewing turf surfaces, installing floodlights and considering synthetic surfaces when applicable. |
| Additional Priorities | | | |
| Aboriginal Cultural Heritage | <p>Add action: Prepare an Aboriginal Interpretation Strategy.</p> <p>Add action: Incorporate Aboriginal consultation protocols made in collaboration with Aboriginal community, in Community Participation Plans, and community engagement strategies.</p> <p>Add action: Develop a mapping methodology based on Aboriginal community knowledge eg Tweed Shire Council Aboriginal Cultural Heritage Management Plan.</p> <p>Add action: Investigate new heritage listings for inclusion in Schedule 5 of the LEP or review existing listings for Aboriginal</p> | <p>WEPA suggests that in the interests of reconciliation and inclusion, Council should consider the preparation of an Aboriginal Interpretation Strategy as an action for inclusion in the LSPS. Campbelltown has proposed this in its draft LSPS where it intends for the strategy to support the reflection of Campbelltown's historical and contemporary Aboriginal culture into the city's built form. Adopting first language names for places is a critical first step.</p> <p>Already some research has been done for Willoughby on Aboriginal place names.</p> | Any future Interpretation Strategy, mapping changes, LEP amendments and other changes can be considered at the LEP review stage and can be developed in consultation with the Aboriginal Heritage Office. |

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| | <p>significance.</p> <p>Add action: Integrate Aboriginal Cultural Heritage into local character statements / place-based planning / Planning Agreements for Growth Precincts and Planning Proposals so Aboriginal culture and values are included in design frameworks.</p> <p>Add action: Review land use zones and provisions to protect and enhance identified heritage values and facilitate adaptive re-use where appropriate.</p> <p>Add action: The LEP template gives scope for new LEP aims to design with Country with associated definitions</p> | | |
| Air Quality | <p>Add action: Collaborate with appropriate agencies to ensure that representative air monitoring is undertaken across the LGA and particularly near main roads, industry and tunnel stacks.</p> | <p>Council should collaborate with the appropriate agencies to ensure that representative air quality samples are taken across the LGA. This will be even more important if the NSW Government proceeds with the Beaches Link car tunnel.</p> | <p>Noted. Council undertakes air quality monitoring at Artarmon. Further details are available on Council's website.</p> |