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Australia's property industry

## Creating for Generations

4 October 2019

Ms Debra Just  
Chief Executive Officer  
Willoughby City Council  
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Dear Ms Just

### Draft Local Strategic Planning Statement

The Property Council welcomes the opportunity to provide comments on Council's draft local strategic planning statement (LSPS).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the following comments for your consideration.

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*. It 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*.

Our members look forward to the finalisation of Council's LSPS by 30 March 2020 and the subsequent process that will involve Council updating the *Willoughby Local Environmental Plan 2012* to give effect to the relevant provisions of the regional and district plans.

Comments in specific parts of the draft LSPS and are provided in the following submission.

Should you have any questions, please do not hesitate to contact Troy Loveday, Senior Policy Advisor on (02) 9033-1907.

Yours sincerely

A handwritten signature in dark ink, appearing to read "William Power", with a long, sweeping horizontal line extending to the right.

**William Power**  
**A/NSW Executive Director**  
**Property Council of Australia**

## **Theme 1 – A Liveable City**

### Housing the City

**Priority #1:** *Increasing housing diversity to cater for families, the ageing population, diverse household types and key workers.*

The draft LSPS has identified a range of actions to support the achievement of this priority, including the completion of Council's Housing Strategy and a review of the planning controls for Chatswood CBD to facilitate delivery of an increased number of medium and high-density dwellings.

The draft plan indicates that between 6,000 and 6,700 new dwellings will be required in the Willoughby LGA between 2016 and 2036. It anticipates that enough capacity under current controls and proposed changes to accommodate the Council's 20-year housing forecast. Three focus areas for new housing have been identified in the Housing Strategy which is an appropriate response. We look 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.

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. It is proposed that new housing stock should meet the changing needs of the community. This response is supported.

**Priority #2:** *Increasing the supply of affordable housing*

Willoughby has an affordable housing contribution scheme in place under Clause 6.8 of Willoughby Local Environmental Plan 2012 (WLEP 2012). At present, most new development on identified sites is required to dedicate to Council a minimum of 4% of the total floor space as new affordable dwellings. The draft LSPS is proposing to increase this contribution to 7% by 2021 and 10% by 2026.

The Property Council appreciates the need for more affordable housing across Sydney and accepts that Willoughby's scheme has been in operation for many years. The approach proposed in the draft LSPS does not follow position taken by the Greater Sydney Commission (GSC) in its Greater Sydney Regional Plan and North District Plan. The Property Council would prefer 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.

We support 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.

### A City for People

**Priority #3:** *Enhancing walking and cycling connections to Willoughby's urban areas, local centres and landscape features.*

The draft LSPS has proposed three actions (medium/long term and ongoing) aligned to Priority 3. The Property Council supports these actions.

**Priority #4:** *Ensuring that social infrastructure cater to the population's changing needs and is accessible to foster healthy and socially connected communities.*

The draft LSPS has proposed eight actions (to be actioned in the short, medium and long term as well as 3 ongoing actions) aligned to Priority 4. It is proposed that Council will review its local contributions plan every 5 years to ensure it reflects the changing needs of the community. The Property Council supports this objective to ensure that Council is collecting contributions for the right social infrastructure in the right locations. It is important that Council's contribution rates do not jeopardise development feasibility and are appropriately apportion the cost of new social infrastructure between the existing community and new residents.

#### A City of Great Places

***Priority #5: Respecting and enhancing heritage and local suburban character.***

The draft LSPS has proposed five actions (one to be implemented in the short term and three ongoing actions) aligned to Priority 5. The Property Council supports these actions. Where Council embarks on any significant review of its listed heritage items or conservation areas we assume that it will undertake the necessary community engagement for that review.

### **Theme 2 – A Productive City**

#### A Well-connected City

***Priority #6: Planning for local centres which are vibrant places that meet the everyday needs of the population.***

The draft LSPS has proposed five actions (2 short-term, 1 medium term and 1 ongoing) aligned to Priority 6. The Property Council supports these actions, particularly where they encourage residential diversity, additional commercial floor space and improvements to the public domain. We welcome any review of planning controls in Council's local centres to achieve the above objectives and the participating in the community engagement linked to it.

***Priority #7: Developing Willoughby LGA transport system and Chatswood's role as a transport hub for Willoughby and the North Shore.***

The draft LSPS has proposed four actions (one short term, two short to medium term and one medium to long term) aligned to Priority 7. The Property Council supports Willoughby Council's intention to pursue these actions.

#### Jobs and Skills

***Priority #8: Connecting Willoughby's network of centres with each other and to Greater Sydney by mass transit.***

The draft LSPS has proposed two actions (one short term and one short to medium term) aligned to Priority 8. The intention to develop an integrated transport strategy that considers ways to improve public transport linkages between Willoughby's local centres and the Chatswood CBD is supported.

***Priority #9: Developing Chatswood CBD as a key commercial centre and integral part of the Eastern Economic Corridor.***

The draft LSPS has proposed five actions (the majority to be implemented over the short, medium and long term) aligned to Priority 9. The Property Council supports the development of Chatswood CBD as a key commercial centre and the focus on employment growth. 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.

Action 4 under Priority 9 seeks to "develop and promote Chatswood's distinct role in the Eastern Economic Corridor". The sub-actions appear to leverage Chatswood's unique character and attributes. The Property Council welcomes engaging further with Council on the development of greater detail about how action will be implemented.

Action 5 under Priority 9 involves Council seeking contributions to provide public and social infrastructure. This would be an action that our members would have a strong interest. We would certainly 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. We would recommend Council provide further detail to landowners and industry regarding this action before the LSPS is finalised.

***Priority #10: Protecting the role of Willoughby's industrial lands as urban service hubs for the Lower North Shore.***

The draft LSPS proposes five actions (a single short term, a short to medium term and three ongoing) aligned to Priority 10. The preparation of an industrial lands strategy for Willoughby is considered necessary to give effect to the District Plan. It is important that Council assess the present and future needs for industrial zoned land within the city.

***Priority #11: Supporting St Leonards to develop as a commercial and health and education precinct.***

The draft LSPS has proposed two ongoing actions aligned to Priority 11. It is important that the viability of St Leonards as a commercial precinct is supported and encouraged into the future. These actions are supported by the Property Council and should be prioritised to protect this office market.

### **Theme 3 – A Sustainable City**

#### A City in its landscape

***Priority #12: Enhancing the health of Willoughby's waterways.***

This Priority and the related four actions are appropriate and have in-principle support from the Property Council.

***Priority #13: Protecting Willoughby's bushland and biodiversity.***

This Priority and the related four actions are appropriate and have in-principle support from the Property Council.

***Priority #14: Increasing Willoughby's tree canopy coverage.***

This Priority and the related four actions are appropriate and have in-principle support from the Property Council. Where any of the actions will alter planning controls or regulations for the development of land, we welcome the opportunity to comment on those specific changes.

#### An efficient city

***Priority #15: Improving the efficiency of Willoughby's built environment.***

This Priority and a majority of the ten related actions are of interest to our members. The Property Council supports Council's focus on sustainability.

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 with existing requirements for office and residential developments. This includes Actions 1, 5, 6 and 9.

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.

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.

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.

A resilient City

***Priority #16: Increasing resilience to climate change, extreme weather and other shocks and stresses.***

This Priority and the seven related actions are appropriate and have in-principle support from the Property Council.

**Theme 4 – A City that Aligns Infrastructure with Growth**

A City supported by infrastructure

***Priority #17: Augmenting local infrastructure and using existing infrastructure more intensively and effectively to accommodate planned growth.***

The draft LSPS has proposed five actions (mostly ongoing and a medium to long-term) aligned to Priority 17. These actions are generally appropriate and the Property Council would welcome further discussions on any Council proposal to review its 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.

***Priority #18: Leveraging planned major infrastructure investments and projects to support growth.***

The draft LSPS had proposed five actions (which are mostly ongoing with a short-term and a medium to long-term) aligned to Priority 18. The Property Council is supportive of actions Council is proposing to leverage investment in major infrastructure within the city.

A Collaborative City

***Priority #19: Working with other organisations to provide required infrastructure.***

The draft LSPS has proposed six actions (split between short and medium-term and ongoing) aligned to Priority 19. The Property Council supports Council adopting a collaborative approach to the delivery of infrastructure within the city.

***Priority #20: Co-ordinating economic development for Chatswood and St Leonards.***

The draft LSPS has proposed two actions (one ongoing and one medium/long-term) aligned to Priority 20. The Property Council supports these actions and welcomes the opportunity to work closely with Council on their implementation where applicable.