

Attachment 4 - Public submissions and responses

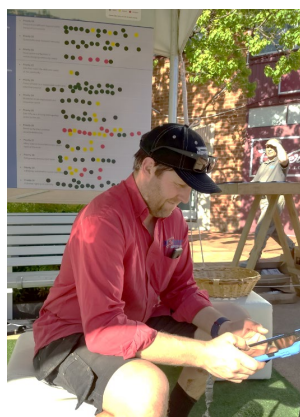


Towards 2040

Northern Beaches Local Strategic Planning Statement

Community Engagement Report Submissions and responses from public exhibition held 27 September to 10 November 2019

February 2020



Contents

Acronyms	3
Introduction	4
Public exhibition of <i>Towards 2040</i>	5
Public submissions summary.....	8
Summary of issues from written public submissions	11
Sustainability – written public submission issues and responses	16
Protection of the environment and support for sustainability measures (21).....	16
P1 – Coastal and waterway management and Pittwater Waterway (31).....	16
P2 – Bushland and biodiversity policy, management actions, clearing and offsets (33)	18
P3 – Scenic and cultural landscapes (10)	19
P4 – Metropolitan Rural Area (MRA) extent, future zoning, and the deferred lands planning proposal (46).....	20
P5 – Green urban environments including tree canopy, urban heat and the green grid (28).....	23
P6 – Open space for recreation supply, use, access and environmental impacts (41)	26
P7 – Sustainable development, energy, water and waste efficiency (49)	28
P8 – Natural and urban hazards, bush fire and climate change (35)	31
Infrastructure and collaboration – written public submission issues and responses.....	35
P9 – Infrastructure deficit, delivery and financing, population growth and collaboration (103).....	35
Liveability – written public submission issues and responses	39
P10 – Education including schools, tertiary education and university (34).....	39
P11 – Social infrastructure including community facilities, health, sport and recreation facilities and shared use (22)	40
P12 – Community needs including seniors, youth and cemeteries (20).....	41
P13 – Aboriginal culture, heritage and communities (11)	42
P14 – Arts and creativity (4)	44
P15 – Housing supply, diversity and Ingleside (89).....	45
P16 – Affordable and social housing provision, boarding houses and rental conditions (28).....	47
P17 – Local character, design excellence and the public domain (22).....	49
P18 – Aboriginal and European heritage (7)	50
Productivity – written public submission issues and responses.....	51
P19 – Regional transport including the Beaches Link Tunnel, B-Line and BRT and mass transit (58).....	51
P20 – Connectivity through public transport, active travel and technology (68).....	53
P21 – Road space, friendly streets, freight and parking (30).....	55
P22 – Jobs, centres and retail (38).....	56
P23 – Frenchs Forest (21).....	59
P24 – Brookvale (19)	62
P25 – Dee Why (11)	64
P26 – Manly (14)	65
P27 – Mona Vale (17).....	67
P28 – Employment lands and managing conflicts (16).....	68
P29 – Tourism management, opportunities and short term accommodation (23).....	69
P30 – Night-time economy (17).....	70

Acronyms

Acronym	Name
DCJ	NSW Department of Communities and Justice
DCP	Development Control Plan
DOE	NSW Department of Education
DPI Fisheries	Department of Primary Industries - Fisheries
EPA	NSW Environment Protection Authority
DPIE	NSW Department of Planning, Infrastructure and Environment
GBCA	Green Building Council of Australia
GSC	Greater Sydney Commission
GSC Assurance process	GSC Assurance Phase 3 feedback includes feedback from several agencies
Heritage DPC	Heritage - the Department of Premier and Cabinet
LEP	Local Environmental Plan
LGA	Local Government Area
MLALC	Metropolitan Local Aboriginal Land Council
MRA	Metropolitan Rural Area
NSLHD	Northern Sydney Local Health District
NSW RFS	NSW Rural Fire Service
NPWS	National Parks and Wildlife Services
PBP	Planning for Bush Fire Protection
SLSC	Surf Life Saving Clubs
TfNSW	Transport for NSW

Introduction

Purpose of report

This Report summarises the outcomes of Stage Four: Public exhibition of *Towards 2040*, the draft Local Strategic Planning Statement (LSPS). It should be read in conjunction with the Council Report 25 February 2020 and relevant attachments including the final draft *Towards 2040* (February 2020), exhibited draft *Towards 2040* (September 2019) with track changes, Summary of proposed amendments to *Towards 2040*, Public submissions and responses (this Report) and NSW Government Agency submissions and responses).

A description of the community and stakeholder engagement process undertaken prior to this public exhibition and other relevant links and documents are described below.

Community and stakeholder engagement process

Council undertook an extensive community and stakeholder engagement process in developing *Towards 2040*, with this report summarising the process and outcomes from the public exhibition. In summary, community and stakeholder engagement undertaken to date includes:

Phase 1 – LEP Review

- Greater Sydney Commission (GSC) technical working groups (TWGs)
- Targeted meetings with NSW Government agencies
- LEP Review Report adopted by Council November 2018
- Internal staff workshops and survey
- Community and stakeholder engagement scoping and planning.

Phase 2 – Draft LSPS

- Stakeholder engagement
 - GSC multi-day workshop 'assurance expo' with State agencies
 - Councillor and staff workshops
 - GSC technical 'health check'
 - Technical workshops with Council's project consultants
 - Targeted meetings with adjoining Councils.
- Community and stakeholder engagement process
- Stage One:– community awareness and information sharing:
 - Online platforms ([Your Say page](#) and [Corporate](#))
 - Publication of information booklet – '[Planning our Sustainable Future](#)'
 - Engagement analysis of 47 strategic Council engagement reports
 - Placescore LSPS insights from over 3,000 surveys
 - Online registrations, social media posts and email notifications and comments
 - Videos including an introductory [webinar](#), insights from the [NSW Chief Planner](#) and an interview with '[Little Locals](#)'
 - Advertisements in the Manly Daily, Pittwater Life and Peninsular Living.
- Stage Two: Community and stakeholder engagement process – developing ideas and parameters:
 - Community preferences survey (172 responses)
 - Strategic Reference Group (SRG) workshop (40 community members – see [video](#))
 - Community group and external stakeholder briefings (10 community groups).
- Stage Three: Testing and refining priorities:
 - Seven focus groups with 51 participants including one for each of the five wards, one youth and one Culturally and Linguistically Diverse (CALD)
 - Survey testing draft priorities (245 responses)
 - SRG presentations.
- Stage Four: Public exhibition of draft LSPS:
 - Introduction [video](#)
 - Council Report 24 September 2019 summarising process to date and description of key issues
 - Publication of [draft Towards 2040](#) and 5 technical studies including:
 - [Demographic Analysis – Strategic context](#)
 - [Housing Strategy - Issues and opportunities paper](#)
 - [Employment Study - Background report](#)
 - [Social Infrastructure Study - Issues and opportunities background paper](#)
 - [Planning for our Environment - Background paper](#)
 - Engagement results [webpage](#) and publication of [Community and Stakeholder Engagement Report](#) which includes the community engagement analysis report, Placescore LSPS insights report, Perceptions survey results, Workshop and focus group results report and Draft priorities survey results
 - Five targeted information sessions for community groups (approximately 45 people)
 - Presentations to SRGs (approximately 90 people)

- Five drop-in information sessions with the opportunity to complete the online survey with iPads or participate in a dot-voting activity (approximately 260 people)
- Public exhibition summary [video](#).

Public exhibition of *Towards 2040*

Exhibition and submissions period

Towards 2040, and supporting background papers, were placed on public exhibition for a period of 44 days (approximately six weeks), from 27 September to 10 November 2019, which satisfies the minimum 28 day requirement in the EP&A Act.

Exhibited materials

The following documents were exhibited:

- *Towards 2040* - draft Northern Beaches Local Strategic Planning Statement
- Overview document (18 page summary document)
- Plan on a page (1 page summary).

The following supporting documents were also exhibited as part of the exhibition package:

- Demographic Analysis
- Housing Issues and Opportunities Paper
- Employment Study – Background Paper
- Social Infrastructure issues and Opportunities Paper
- Environment Background Paper
- Community Engagement Report.

Exhibition venues

Hard copies of the *Towards 2040* exhibition package were available at the following customer service locations:

- Avalon Customer Service Centre
- Dee Why Customer Service Centre
- Manly Customer Service Centre
- Mona Vale Customer Service Centre.

Hard copies of the *Towards 2040* exhibition package were available at the following libraries:

- Dee Why Library
- Forestville Library
- Glen Street Library
- Manly Library
- Mona Vale Library
- Warringah Mall Library.

Electronic copies of *Towards 2040* were available online at Northern Beaches Council 'Your Say' website: <https://yoursay.northernbeaches.nsw.gov.au/towards-2040>

There were 3,480 visitors to the project Your Say page during the exhibition period.

Public notice

Media releases for *Towards 2040* were issued as follows:

- Manly Daily, 21 September (reached 236,000 people)
- Northern Beaches Council website, 25 September
- Peninsular Living, 1 October and 1 November (reached 87,000 people)
- Pittwater Life editorial, October edition (reached 32,000 people).

Notices were placed in the following newspapers advising details of the public exhibition:

- Manly Daily, 28 September; 5 October; 12 October; 19 October; 26 October; 2 November; 9 November (reached 236,000 people)
- Pittwater Life, 1 October
- Peninsular Living south, 1 October (reach 57,000)
- Peninsular Living north, 1 October.

Two local schools voluntarily participated in distribution of flyers.

Online media

A three-minute video was promoted online via Council's website, the *Towards 2040* project page, Facebook, LinkedIn, Youtube and the Mayor's Message. A 30 second video was promoted online via Council's E-News, Facebook and Instagram. For the Facebook posts, Council's video reached 15,367 users and prompted 45 reactions and 507 post clicks the first time. The second Facebook post reached 14,062 users and prompted 702 post clicks. The LinkedIn post reached all 1,261 followers prompting 37 reactions and 79 clicks and the Youtube introduction video was viewed 668 times.

On Council's project website, multiple on-line options were provided to review the content, including a:

- 5 minute option, including a high level summary of the 30 priorities and access to the survey
- 10 minute option, including the overview document and access to the survey
- 15+ minute option, including access to an interactive version of the document and access to the survey.

Survey

Council's Your Say webpage hosted an online survey during the public exhibition. The survey asked respondents to indicate how much they agreed with the 30 priorities on a five-point scale ('strongly agree', 'agree', 'neutral', 'disagree' or 'strongly disagree') and whether overall, they supported *Towards 2040*, selecting either 'yes', 'yes, with changes', 'no' or 'unsure'. Written comments were also received via this survey.

Online interactive document

An online interactive version of *Towards 2040* was available to view on Council's Your Say webpage during the public exhibition period. The document was published using Konveio software, which allowed users to post comments on the document and click on links to view introductory videos.

Notification of land owners

Council notified landowners within the LGA via a flyer with rates notices, issued on 21 and 22 October 2019, reaching over 70,500 people.

Notification of key stakeholders

Bulk emails were sent to key stakeholders including:

- Four separate emails to registered persons following the 'Planning our sustainable future project' (700 people reached per email)
- Three emails to persons registered on Council's community engagement newsletter (20,000+ people reached per email)
- One email to businesses on the Northern Beaches (12,000 businesses reached)
- One email to resident associations on the Northern Beaches (24 associations reached).

Information sessions

Council hosted five targeted information sessions during the exhibition period:

- Mona Vale (30 September), 4pm-6pm
- Frenchs Forest (1 October), 4pm-6pm
- Freshwater (3 October), 4pm-6pm
- Narrabeen (8 October), 4pm-6pm
- Manly (10 October), 4pm-6pm.

Approximately 45 people attended the information sessions.

Council presented to the six Strategic Reference Group's (SRG) during the exhibition period:

- Transport and travel (17 October), Manly
- Partnership and participation(23 October), Dee Why
- Places for people (24 October), Narrabeen
- Community and belonging (30 October), Manly
- Economic and smart communities (6 November), Manly
- Environment (7 November), Dee Why.

Approximately 90 people attended the SRG presentations.

Council hosted five drop-in information sessions during the exhibition period:

- Pittwater (16 October), Mona Vale Library Lane, 10am-2pm
- Narrabeen (19 October), Berry Reserve, 10am -2pm
- Frenchs Forest (22 October), Forestville Shops, 1pm-5pm
- Curl Curl (23 October), Meriton Dee Why, 10am-2pm
- Manly (24 October) – Manly Forecourt, 3pm-7pm.

Approximately 260 people attended the drop-in information sessions, which were opportunities for members of the public to discuss *Towards 2040* with the project team. Hard copies of the exhibition package and large format prints of the structure plan and priorities were available to view at these sessions.

Members of the public also filled out the online survey on iPads at the sessions and participated in a dot-voting activity where they were asked to indicate whether they agreed, disagreed or felt neutral about each priority. The results of the dot-voting activity were not specifically considered as part of the submissions analysis.

Meetings (1:1)

Council undertook meetings (1:1) with interested groups and/or individuals throughout the planning process. These meetings provided an opportunity to inform, consult and involve members of the public in the planning process.

Agency notifications and submissions

Exhibition notification emails were sent to 29 NSW Government agencies and 16 submissions were received from the following agencies:

- Cancer Institute NSW
- Cemeteries and Crematoria NSW
- City of Ryde
- Create NSW
- Department of Planning Industry and Environment – Development and Transactions
- Department of Primary Industries – Fisheries
- Environmental Protection Authority
- Greater Sydney Commission and Department of Planning, Industry and Environment
- Heritage NSW
- Northern Sydney Local Health District (NSLHD) Health Promotion
- NSW Rural Fire Service
- Office of Sport
- State Library of NSW
- Sydney Water
- Transport for NSW
- Water NSW.

Council also met with the GSC and other Agencies as part of the GSC Assurance process on 12 November 2019 and 4 February 2020. This feedback has been incorporated into the analysis of submission responses referenced throughout this Report and also in the Council Report 25 February 2020 and attachment 'NSW Government Agency submissions and responses'.

Public submissions summary

Number of public submissions

A total of 337 responses were received, including 321 public submissions and 16 NSW Government agency submissions.

The 321 public submissions, included:

- 218 surveys (including 173 surveys with written comments)
- 95 email and/or written letter responses
- 8 interactive PDF responses.

Feedback from Phase 3 of the assurance process with the GSC and the Department has been incorporated into the analysis of submission responses.

Geographical spread of public submissions

Submissions were received from across the LGA. The geographical spread of public submissions received is shown in Figure 1.

Survey results

In total, 218 survey responses were received. The majority of respondents indicated that overall, they supported *Towards 2040* either with changes (51%) or without changes (37%).

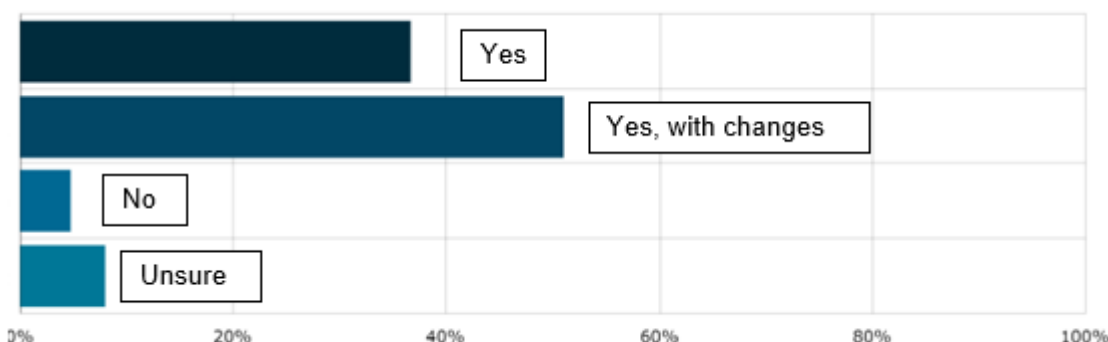


Figure 2 – Towards 2040 – overall support for Towards 2040

It is important to note that the majority of respondents chose the 5 or 10 minute online option which included a review of the one page summary or overview document only.

The results for the priority questions indicated that the majority of respondents either strongly agreed or agreed with every priority (refer to Figure 5). The highest levels of support amongst the themes were for the sustainability priorities, with Priority 1 (Healthy and valued coasts and waterways) with the strongest level of support, followed by Priority 20 (Sustainable local transport networks) and Priority 7 (A low-carbon community, with high energy, water and waste efficiency).

The priorities with the lowest levels of support were Priority 10 (World class education facilities, including a university), Priority 27 (Mona Vale as the contemporary urban heart of the north), Priority 29 (A thriving, sustainable tourism economy) and Priority 9 (Infrastructure delivered with employment and housing growth). Respondents were also able to provide further comments on each of the themes and *Towards 2040* overall, and attach a file as a written submission. The written survey responses are incorporated into the submissions analysis below and addressed in this Report.

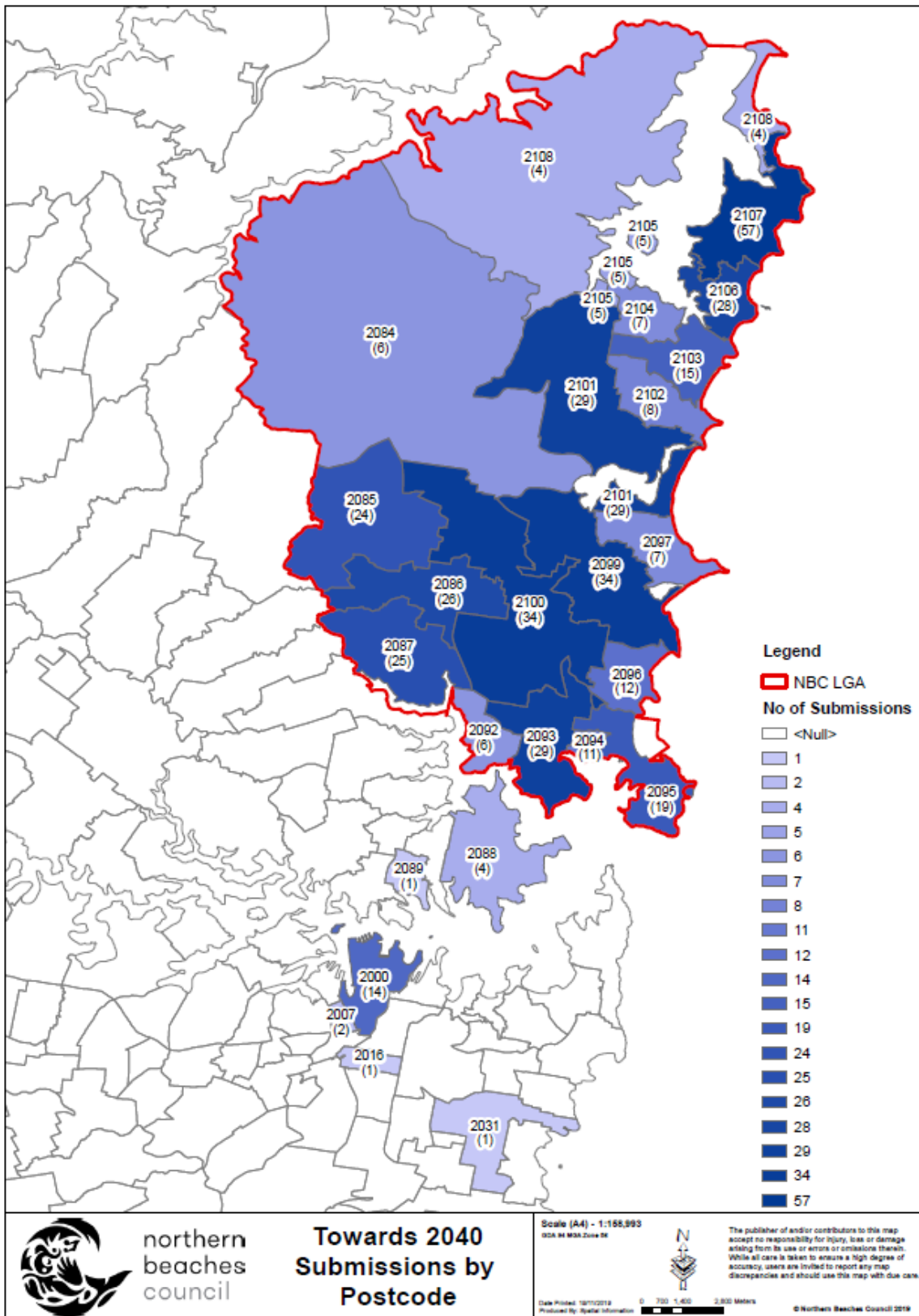


Figure 1 – Towards 2040 submissions by postcode

Towards 2040 survey results

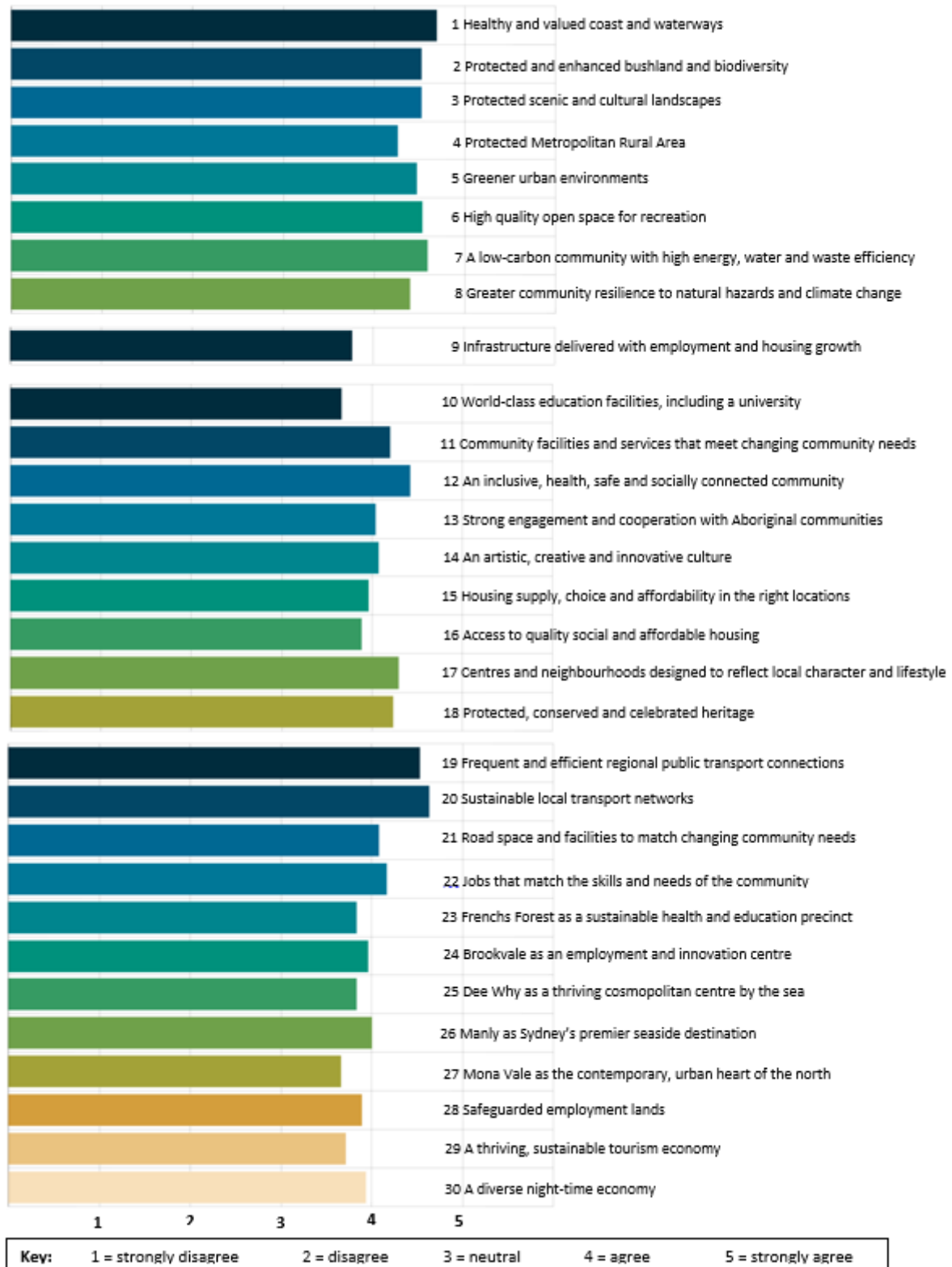


Figure 3 – Towards 2040 – survey results

Summary of issues from written public submissions

Key issues for stakeholder groups

Stakeholder group	Key issues
Community groups	Protection of the environment; transport and infrastructure; population growth and local character. See responses in section 'Sustainability'.
Developers	Requests from property owners or consultants on behalf of property owners seeking site specific zoning changes or uplift, including for sites within town centres, employment lands and land owned and managed by religious and not-for-profit organisations. See responses in P9.
Providers of social / affordable housing	Offers of assistance to Council from organisations including community housing providers and not for profit organisations in identifying affordable housing opportunities and mechanisms to deliver the proposed affordable housing targets, offering a number of solutions. Concerns with the proposal to work with the NSW Government to amend State policies that override local provisions, such as <i>State Environmental Planning Policy (Affordable Rental Housing) 2009</i> . See responses in P16.
Retail sector	Requesting further recognition of the retail sector, amendments to provisions restricting supermarket sizes in the Standard Instrument LEP, flexibility in planning controls and the need to plan for and accommodate large format retail. See responses in P22.
Metropolitan Rural Area (MRA) land owners	Requests to consider this area for future housing including seniors living, boarding houses, low density residential and smaller lot sizes, and objections to the proposed exemptions to State Environmental Planning Policies (SEPPs) for boarding houses, seniors housing and medium density housing (SEPP exemptions). Objections to the use of environmental zones on private property, inclusion of Belrose North in the MRA and reference to the Oxford Falls Valley and Belrose North strategic review. See responses in P4.
Metropolitan Local Aboriginal Land Council (MLALC)	Support for working with Council to implement initiatives in their community land and business plan and a request to partner with Council on their action to improve LEP and DCP controls to protect Aboriginal heritage. Objection to the inclusion of Belrose North in the MRA due to impacts on the feasibility of this land for future development. See responses in P4 and P13.

Key issues addressed in both public and agency submissions

Key issue	Public submissions	Agency feedback*
Public transport initiatives including mass transit	87	TfNSW, GSC**
Concerns with population growth and adequate infrastructure	68	
Housing targets and affordable housing	68	GSC
Stronger protection of the environment	52	DPI Fisheries, EPA
Greater focus on sustainable development, energy, water and waste efficiency	49	GSC, EPA, Sydney Water
Directions for the Metropolitan Rural Area	46	GSC
Sustainable recreation and open space	45	GSC, DPI Fisheries, EPA, Office of Sport
Site specific rezoning requests and spot rezonings	40	
Jobs, centres and retail	38	GSC
Response to climate emergency, natural hazards and bush fire	35	NSW RFS, Cancer Institute NSW
Education including schools, tertiary education and university	34	NSLHD, State Library
Tree canopy coverage and targets	22	GSC, Cancer Institute NSW, Community
Local character	22	Heritage DPC, Create NSW
Broadening the range of urban hazards	4	GSC, EPA, Sydney Water

* See acronyms

* Note GSC feedback refers to feedback from the GSC Assurance Phase 3 (GSC Assurance process) which includes feedback from several agencies

Key issues from written public submissions per priority, showing the number of submissions received

Theme and direction	Key issue	# submissions
Sustainability		
Landscape	Protection of the environment and support for sustainability measures	21
	P1 – Coastal and waterway management and Pittwater Waterway	31
	P2 – Bushland and biodiversity policy, management actions, clearing and offsets	33
	P3 – Scenic and cultural landscapes	10
	P4 – Metropolitan Rural Area (MRA) extent, future zoning, and the deferred lands planning proposal	46
	P5 – Green urban environments including tree canopy, urban heat and the green grid	28
	P6 – Open space for recreation supply, use, access and environmental impacts	41
	P7 – Sustainable development, energy, water and waste efficiency	49
Efficiency		
Resilience	P8 – Natural and urban hazards, bush fire and climate change	35
Infrastructure and collaboration		
Infrastructure and collaboration	P9 – Infrastructure deficit, delivery and financing, population growth and collaboration	103
	Community engagement	19
	Site specific zoning requests	19
	Spot rezoning	12
Liveability		
People	P10 – Education including schools, tertiary education and university	34
	P11 – Social infrastructure including community facilities, health, sport and recreation facilities and shared use	22
	P12 – Community needs including seniors, youth and cemeteries	20
	P13 – Aboriginal culture, heritage and communities	11
	P14 – Arts and creativity	4
Housing	P15 – Housing supply, diversity and Ingleside	89
	P16 – Affordable and social housing provision, boarding houses and rental conditions	28
Great places	P17 – Local character, design excellence and the public domain	22
	P18 – Aboriginal and European heritage	7
Productivity		
Connectivity	P19 – Regional transport including the Beaches Link Tunnel, B-Line and BRT	58
	P20 – Connectivity through public transport, active travel and technology	68
	P21 – Road space, friendly streets, freight and parking	30
Jobs and skills	P22 – Jobs, centres and retail	38
	P23 – Frenchs Forest	21
	P24 – Brookvale	19
	P25 – Dee Why	11
	P26 – Manly	14
	P27 – Mona Vale	17
	P28 – Employment lands and managing conflicts	16
	P29 – Tourism management, opportunities and short term accommodation	23
	P30 – Night time economy	17

All issues in order of number of submissions received

Sub-issue	# submissions	P*
Public transport improvements including electric buses and local services	52	P20
Bushland and biodiversity policy, management actions, clearing and offsets	33	P2
B-Line extension to Newport, east-west links and transition to BRT	30	P19
Housing supply including housing projections and proposed locations for housing growth	30	P15
Parking needs	29	P21
Affordable housing/social housing	28	P16
Energy efficiency, carbon emissions and targets	27	P7
Population growth	27	P9
Proposed university and tertiary education needs	25	P10
Metropolitan Rural Area (MRA) private land owner submissions	25	P4
Housing diversity including boarding houses and medium density	24	P15
Mass transit including light and heavy rail, trackless trams	23	P19
Tourism management, opportunities and short term accommodation	23	P29
Active travel including cycling and walking infrastructure	22	P20
Climate change, natural hazards and climate emergency	22	P8
Issues with Deferred Lands Planning Proposal	22	P4
Local character, design excellence and the public domain	22	P17
Social infrastructure including community facilities, health, sport and recreation facilities and shared use	22	P11
Frenchs Forest	21	P23
Protection of the environment and support for sustainability measures	21	NA
Centre classifications and activation	21	P22
Community needs including seniors, youth and cemeteries	20	P12
Brookvale	19	P24
Community engagement	19	NA
Open space supply	19	P6
Open space use and infrastructure requirements	19	P6
Site specific zoning requests	19	NA
Beaches Link Tunnel proposal including public transport	18	P19
Mona Vale	17	P27
Night time economy	17	P30
Retail including large format retail and supermarkets	16	P22
Waste management, single use plastics and recycling	16	P7
Employment lands and managing conflicts	16	P28
Coastal management including aquatic reserves and climate change impacts	15	P1
Infrastructure deficit	15	P9
Infrastructure delivery including utilities	15	P9
Sustainable development including buildings and infrastructure	15	P7
Manly	14	P26
Job opportunities and working from home	13	P22
Support for protecting the Metropolitan Rural Area (MRA)	13	P4
Tree canopy loss	13	P5
Bush fire hazards and management	12	P8
Spot rezoning	12	NA

Sub-issue	# submissions	P*
Aboriginal culture, heritage and communities	11	P13
Dee Why	11	P25
Waterway management including water quality, pollution, sewer management and creek naturalisation	11	P1
Green urban environments and urban heat	10	P5
Ingleside future and planning	10	P15
Key landscapes, building heights and view protection	10	P3
Pittwater Waterway Strategy and proposed mooring numbers, marina expansion and boat ramp	9	P1
School supply and standards	9	P10
Transport technology including autonomous vehicles, electric cars and the sharing economy	9	P20
Water supply and support for water recycling	9	P7
Environmental impacts from recreation	8	P6
Aboriginal and European heritage	7	P18
Green grid	7	P5
Reallocation of road space, friendly streets and freight	7	P21
Tree canopy targets	6	P5
Affordable/social housing provider feedback	5	P16
Coast Walk	5	P3
Collaboration and participation for infrastructure delivery	5	P9
Resilience and food supply	5	P8
Urban hazards including air, noise and light pollution	5	P8
Arts and creativity	4	P14
Metropolitan Rural Area (MRA) extent	4	P4
Financing infrastructure provision, privatisation and public private partnerships	3	P9
Access to open space	2	P6

* P = Priority number from Towards 2040

Sustainability – written public submission issues and responses

Note: The numbered actions, figures and maps marked with an asterisk reference the version of *Towards 2040* as presented to the Council meeting 25 February 2020.

Protection of the environment and support for sustainability measures (21)

Submission summary	Response summary
<p>There were many general comments from the community that were in strong support of the priorities that related to the protection of the environment, increased efficiencies and adaptation to natural hazards. These submissions recognised Council's responsibility in protecting the environment and advocated for strong planning controls. These submissions also raised concerns with increased development and impacts on the environment.</p>	<p>This is addressed throughout <i>Towards 2040</i>, including priorities to reduce impacts on the environment (P1, P2, P3, P4, P5, P6). P15 also contains housing principles to limit development where there are unacceptable impacts on tree canopy and to protect the natural environment.</p> <p>New development (which includes infrastructure) will be required to meet the strategic directions of <i>Towards 2040</i>, which include a number of priorities aimed at protecting the environment.</p>
Change	Source
See changes in response to relevant Priorities.	NA

P1 – Coastal and waterway management and Pittwater Waterway (31)

Coastal management including aquatic reserves and climate change impacts (15)

Submission summary	Response summary
<p>Calls for Council to lead the way in coastal and marine management, reduce impacts on marine life (e.g. fishing) and increase marine parks. Also raised was the need to adapt to changing waterways and shorelines in response to climate change</p>	<p>Impacts on coastal and marine environments from development will be addressed through implementation of the Risk-based framework pilot project with DPIE (A1.1), the coast action plan for <i>Protect. Create. Live.</i> (A1.5) and coastal management programs for the open coast, Hawkesbury River and Sydney Harbour (A1.6). P8 addresses coastal impacts associated with climate change.</p> <p>The Marine Estate Management Authority advises the NSW Government on the management of the NSW marine estate while the NSW DPI – Fisheries manage recreational fishing in NSW under the Fisheries Management Act. Although A1.9d outlines Council's intent to investigate the feasibility of new aquatic reserves, DPI Fisheries have advised significant work has already been done in this space and a more suitable focus may be better management of the existing aquatic reserves and marine estate.</p>
Change	Source
A1.4 amended to refer to preparing an open space and recreation strategy and map a local green grid that supports environmentally sustainable access to the coast, in addition to waterways	DPIE – Development and Transactions, Community
A1.9d expanded to identify better management of existing aquatic reserves and marine estates in addition to the identification of aquatic reserves in local green grid projects	DPI Fisheries, Community
A1.10 added to work with relevant stakeholders to promote community stewardship for Manly-Freshwater World Surfing Reserve, with SLSC as a partner	Community
P8 principle added with respect to managing risks associated with sea-level rise for coastlines and beach landscapes	GSC, Community
<i>See also NSW Government Agency submissions and responses for changes made in response to DPI Fisheries, Sydney Water and Office of Sport</i>	

Waterway management including water quality, pollution, sewer management and creek naturalisation (11)

Submission summary	Response summary
<p>Calls to improve water quality in waterways and lagoons including better management of sediment, litter and rubbish, stormwater and sewer pollution including sewer outfalls.</p> <p>Support for creek naturalisation and concern that nothing has been done in this space for some time.</p>	<p>Water quality will be addressed through implementation of the Risk-based framework pilot project with DPIE (A1.1), with Map 2 articulating our proposed vision for the LGA's coast and waterways, including areas we'll target for improvement. Waterway health will also be addressed in new LEP and DCP controls (A1.3) and waterway action plan for <i>Protect. Create. Live.</i> (A1.5). P8 also addresses better management of water pollution as an urban hazard.</p> <p>Naturalisation of creeks at Dee Why, Mona Vale and Avalon are local green grid projects for investigation (A1.9). Whilst it is identified as a medium term action, Council will report on the actions annually.</p> <p>A number of changes have been made to add more references to water sensitive urban design and integrated water cycle management in response to submissions from the EPA and Sydney Water, the risk based framework in response to EPA and Council work on this project and recreation matters in response to the Office of Sport.</p>
Change	Source
P1, Map 2 and Figure 26 amended to replace the High Environmental Value (HEV) layer based on updated data, include HEV in Pittwater and exclude HEV in ocean off Manly Beach. The Map 2 legend was also updated to clarify the need maintain or improve existing condition for the river flow objectives as all of these objectives have been met	Council
P1, Figure 26 amended to clarify the hydrological/blue grid for waterways includes groundwater aquifers (not included in the map) and change 'stormwater infrastructure' to 'water infrastructure' (for example, stormwater, potable water, grey water recycling systems) in recognition of integrated water cycle management	Council
P1 principle amended to reference groundwater aquifers	Council
<i>See also NSW Government Agency submissions and responses for changes made in response to DPI Fisheries, Sydney Water and Office of Sport</i>	

Pittwater Waterway Strategy and proposed mooring numbers, marina expansion and boat ramp (9)

Submission summary	Response summary
<p>Concerns with impacts associated with any marina expansion, increase in moorings or additional boat ramps in Pittwater.</p>	<p>The investigation of options for marina expansion, increase in moorings and a new boat ramp on Pittwater relate to Council's adopted Pittwater Waterway Strategy. This strategy outline's Council's intent to maintain the mooring cap number (A1.7) and only consider changes subject to improved mooring methods.</p> <p>As outlined in A1.8, the expansion of the W2 zone is subject to a strategic sites assessment and expansion of the marina will only be considered subject to appropriate regard being given to all impacts including, but not limited to, environmental, social, economic, transport, traffic, visual, and waterway navigation.</p>
Change	Source
A1.4 amended to refer to preparing an open space and recreation strategy, and map a local green grid that supports environmentally sustainable access to the coast, in addition to waterways	DPIE – Development and Transactions, Community, Office of Sport

P2 – Bushland and biodiversity policy, management actions, clearing and offsets (33)

Submission summary	Response summary
<p>Bushland and Biodiversity Policy</p> <p>Support for protection of bushland and biodiversity, including threatened species. The importance of protecting wildlife corridors and tree canopy was raised and concerns with impacts from development and recreation.</p> <p>Some submissions raised the importance of funding the protection of bushland and biodiversity. Some sought examples as to how Council proposes to embed green infrastructure into the planning system (A2.6) and what the implications would be from seeking exemptions to State Environmental Planning Policies (SEPPs) with respect to boarding houses, seniors housing and medium density housing as outlined in A2.2 (SEPP exemptions).</p>	<p>Protection of bushland and biodiversity is addressed in both <i>Towards 2040</i> and <i>Protect. Create. Live</i>. Principles and actions within P2 align with Council's Bushland and Biodiversity Policy and include actions to investigate a local biodiversity offset framework, biodiversity investment opportunities and offset lands for biodiversity stewardship sites (formerly biobank sites) on Council land where appropriate.</p> <p>Actions also include the investigation of options for funding, acquisition and reservation of bushland with biodiversity, habitat, recreational and scenic values, including incentives or assistance to private property owners. Also, the implementation of tree canopy targets outlined in A5.2 will aim to manage and monitor impacts on tree canopy and bushland loss.</p> <p>Green infrastructure is described in P1, Figure 26 as comprising the agricultural grid, ecological grid, hydrological/blue grid and recreational grid. Green infrastructure is already recognised in State Policy including the <i>Region Plan</i> and <i>District Plan</i>, as well as in the Government Architect's draft Greener Places Policy. Embedding green infrastructure into the local planning framework will likely be achieved by the provision of maps and controls within Council's new LEP and associated guidance in Council's DCP, to protect and enhance bushland, biodiversity, waterways and tree canopy. Green infrastructure is recognised as an essential form of infrastructure within P9. P2 and A2.6 outlines Council's intent to work with DPIE to make funding available for green infrastructure through developer contributions, rate reductions or levies.</p> <p>Exemptions from State policies that override local provisions can be obtained via a number of means such as the use of Environmental Protection zones or in some cases, on environmentally sensitive land described within the appropriate State Environmental Planning Policy. The wording of A2.2 which refers to these exemptions has been updated in response to the GSC Assurance process.</p>
<p>Actions to protect bushland and biodiversity</p> <p>Calls for specific actions such as community education, weed management, fencing and infrastructure to prevent roadkill including fauna crossings.</p>	<p><i>Towards 2040</i> seeks to inform future planning and development at a high level and guide infrastructure requirements, collaboration actions and preparation of Council's new LEP and DCP. Specific actions such as educational programs, services and infrastructure delivery, relate more broadly to Council's operations that are outlined in Council's delivery program exhibited on an annual basis. Actions will also be addressed in action plans linked to Council's Environment and Climate Change Strategy, <i>Protect. Create. Live</i>. and a new action has been added to <i>Towards 2040</i> with respect to weed management.</p> <p>Whilst Council acknowledges that wildlife roadkill is a significant threat to biodiversity, the main threats are typically on arterial roads managed by the NSW Government and not Council. Specific roadkill mitigation measures such as exclusion fencing and underpasses are supported by Council during the approval of such projects, however, inclusion in the current document is considered beyond the scope of <i>Towards 2040</i>.</p>
<p>Bushland / tree clearing</p> <p>Concern for bushland / tree clearing and calls for greater enforcement of unauthorised works.</p>	<p>A2.2 seeks to prepare LEP/DCP controls that will protect bushland and biodiversity. This will include a review of controls relating to vegetation removal. Unlawful clearing must be reported to Council. This is addition to directions within Council's Environment and Climate Change Strategy, <i>Protect. Create. Live.</i>, and draft Urban Tree Canopy Plan. A new action has been added to <i>Towards 2040</i> with respect to unauthorised clearing.</p>

Submission summary	Response summary
<p>Biodiversity offsets</p> <p>Concern that biodiversity offsets will result in more loss, and will not benefit the LGA.</p>	<p>P2 includes a principle to avoid, then minimise, impacts on bushland before offsetting is considered.</p> <p>Council staff agree that the approach to 'offsetting' needs be a cautious one. In the absence of abundant offset sites on the Northern Beaches, developments including major projects will be offset distant from the Northern Beaches resulting in a net loss of local biodiversity. This is why A2.3 involves investigation of a local biodiversity offset framework that meets relevant legislation with the aim to offset future development locally.</p>
Change	Source
P2, Figure 27 amended to fix error relating to area of bushland under Council management (1,700ha not 17ha) and change the koala icon to a penguin in recognition of the local extinction of the koala from the Barrenjoey Peninsula as recognised in the text	Community
P2 principle added to protect and enhance sustainable recreation in bushland reserves and natural areas without compromising the integrity of environmentally sensitive areas	Community
A2.5 amended to include reference to urban tree canopy so that it now reads that Council will investigate options for funding, acquisition and reservation of urban tree canopy in addition to bushland with biodiversity, habitat, recreational and scenic values, including incentives or assistance to private property	Community
A2.8* added to prepare an open space and recreation strategy and map a local green grid that supports environmentally sustainable access to bushland where appropriate. Ku-ring-gai, Hornsby, Central Coast councils; MLALC, NPWS; NSW Department of Industry (Crown Lands) listed as partners	Community
A2.9* added to address unauthorised removal of tree canopy or native vegetation, such as through ongoing monitoring and reporting, planning controls in the LEP and DCP, increased enforcement and compliance and education programs	Community
A2.10* added to address compliance and management of invasive species including weeds and pests	Community

P3 – Scenic and cultural landscapes (10)

Key landscapes, building heights and view protection (10)

Submission summary	Response summary
<p>Key landscapes</p> <p>General support for the protection of scenic and cultural landscapes, with requests to recognise heritage and key landscapes including the Brookvale escarpment, the ocean and harbour foreshores, Manly Dam, Mona Vale / Ingleside escarpment, Warriewood and skylines.</p> <p>The importance of protecting landforms and rock outcrops was also raised.</p>	<p>P3 identifies the importance of protecting scenic and cultural landscapes, including escarpments, with Map 4 identifying key high level view corridors. Actions within P3 require Council to prepare an LGA-wide scenic and cultural landscape assessment (A3.1) and to develop planning controls that protect views and scenic and cultural landscapes (A3.2).</p> <p>With respect to Ingleside Chase Reserve, Council entered into an agreement with the NSW Government in June 2019 to register this area as a biobank site. As part of the proposed biobanking agreement, funding provided is used for biodiversity conservation actions, including bush regeneration, revegetation, weed and pest animal control, fencing, bush fire management, signage and track maintenance.</p> <p>P3, Map 4 was amended to show the view corridor at the former Manly Hospital site in response to a submission from DPIE – Development and Transactions.</p>

Submission summary	Response summary
<p>Building heights</p> <p>Concern that A3.2 proposing 'special clauses for height on steeply sloping land', will lead to inappropriate building heights. Also noted was the need to avoid building on ridge lines with heights above the natural canopy.</p>	<p>The special clauses for building height on steeply sloping land referred to in A3.2 must adhere to the principles in P3, which is to protect scenic and cultural landscapes.</p> <p>Actions and principles within P3 have been amended to further reference the protection of ridgelines and skylines.</p>
<p>Private views</p> <p>Suggestion that views from the public realm not be explicitly mentioned as residents expect view protection from private areas as well.</p>	<p>P3 aligns with the <i>District Plan</i> N17 and Action 68 refer to enhancing and protect views of scenic and cultural landscapes from the public realm. Private views are addressed by established planning principles and will be addressed in new LEP and DCP controls.</p>
Change	Source
P3 text amended to reference the 'ocean' and 'harbour' as scenic and cultural landscapes that define the character of an area	Community
P3 principle added to protect the natural landscape, including landforms, rock outcrops and remnant bushland	Community
P3 principle added to avoid new development on ridgelines or in places that will disrupt the skyline	Community
A3.2 amended to reference the need for LEP and DCP controls to address significant ridgelines and skylines when considering scenic and cultural landscapes	Community

Coast Walk (5)

Submission summary	Response summary
<p>Some submissions were unresponsive of coastal walkway due to visual impact, impact on the natural environment and accessibility issues, and the alignment shown on Map 4 near Dee Why lagoon.</p> <p>Those in support saw this project as a significant opportunity for tourism and the local economy.</p>	<p>The 36km coast walk from Manly to Palm Beach is almost complete, with the final section between Newport and Avalon scheduled for completion in early 2021. Impacts associated with this project are subject to relevant environmental assessments.</p> <p>Map 4 has been amended to correct the Coast Walk alignment error.</p>
Change	Source
P3, Map 4 amended to fix error and realign the coast walk behind Dee Why Lagoon. Manly to Bondi walk was also added to this map	Community
P29, Map 32* amended to add Coast walk and Bondi to Manly Walk	Community

P4 – Metropolitan Rural Area (MRA) extent, future zoning, and the deferred lands planning proposal (46)

MRA extent (4)

Submission summary	Response summary
<p>Objections from land owners within Belrose North to the inclusion of their properties in the MRA.</p>	<p>Feedback from the GSC Assurance process outlined the proposed extension to <i>District Plan</i> MRA boundary cannot be considered by the GSC until the next review of the <i>Region Plan</i>.</p> <p>The draft Towards 2040 outlined Council's preferred MRA extent which included the area identified in the Region Plan, all deferred lands (Oxford Falls Valley and Belrose North), plus some additional parcels along Mona Vale Road. This was consistent with mapping in the draft Region Plan (pg 135). However the draft District Plan and revised District Plan amended the MRA boundary to exclude part of</p>

Submission summary	Response summary
	<p>Oxford Falls (south), Cromer Heights (west) and Belrose North, and the reasons for this change remain uncertain.</p> <p>For the final <i>Towards 2040</i>, Council has identified this land area as 'Future MRA investigation area', and will work with the GSC to assess its suitability for inclusion in the MRA when the <i>District Plan</i> is reviewed. Using the precautionary principle, Council will apply the principles and actions in this priority to these lands until that review is complete.</p> <p>Note the <i>Towards 2040</i> maps, figures and text amended to reflect the extent of the MRA as represented in the <i>Greater Sydney Region Plan</i> and to identify areas of Belrose (north), Oxford Falls (south) and Cromer Heights (west) as 'future MRA investigation area'.</p>
Change	Source
P4 principle amended to clarify that urban intensification and subdivision is to be avoided in the MRA and the future MRA investigation area, reflecting Council's commitment to applying a precautionary approach	Community
A4.1, A4.2, A4.4 amended to clarify they apply to the future MRA investigation area, reflecting Council's commitment to applying a precautionary approach	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to the GSC</i>	

Support for protecting the MRA (13)

Submission summary	Response summary
<p>Support for the protection of the MRA, including the prevention of further development due to bush fire risks, transport access and a preference for infill development in existing urban areas.</p> <p>Support for the use of Environmental Protection Zones to protect the MRA and A4.4 which aims to prevent the inappropriate application of State policies that allow urban intensification of the MRA, such as seniors housing. Some submissions requested the inclusion of Ingleside in the MRA.</p> <p>There was also some misunderstanding from some members of the community as to the meaning of the MRA with some assumptions that this land is earmarked for only rural purposes.</p>	<p>Principles in P4 outline Council's intent to limit development to a scale, form and density consistent with the existing character and use of the MRA and to avoid inappropriate urban intensification and subdivision in this area. They also identify the opportunity for land within the MRA for establishing local biodiversity offsets and stewardship agreements.</p> <p>Protection of the MRA is also supported by principles within P8 to avoid intensification of development and incompatible land uses in areas exposed to natural and urban hazards. With respect to future housing, principles in P15 prioritise growth in the right locations such as centres with access to high frequency public transport. Actions 2.2, 4.4, 15.3, 16.5 and 28.2 reference Council's intent to work with DPIE on the application of SEPPs by developing appropriate approaches based on evidence in the local housing strategy.</p> <p>Future zoning of deferred lands will have regard to a range of factors consistent with the principles contained in <i>Towards 2040</i>, Council's local housing strategy, and guidance provided by DPIE.</p> <p>P4 outlines that Ingleside may be included in the MRA depending on the outcomes of bush fire investigations. Ingleside is also addressed in A8.7 and A15.6 which seek to resolve the future of Ingleside to ensure any development is sustainable and resilient to natural hazard.</p>
Change	Source
P4 text amended to better describe the definition of the MRA, explaining it is a similar concept to the former Sydney 'Green Belt' and is also referred to as the peri-urban, non-urban, rural or urban fringe	Community
P4 text amended to remove reference to 'rural' when describing land that includes rural and lifestyle properties to ensure no misunderstanding that the MRA translates directly into rural zones	Community
P4 text amended to describe the large extent of the MRA identified as bush fire prone land as outlined in Figure 31*	Community
P4 principle amended to clarify support for biodiversity offsets and stewardship agreements refers to the establishment of sites for these purposes within the MRA	Community

P4 principle added to encourage the spread of indigenous vegetation and tree canopy to align with objectives within the locality statements for the deferred lands	Community
P4 principle added to ensure development is not intensified in areas where there is unacceptable risk to human life and property from hazards such as bush fire, to reiterate existing principles in P8	Community
A4.2 amended to clarify the LEP and DCP controls will also be informed by environmental hazards and constraints and local character studies	Community
P4 text and A4.3 amended to clarify that investigations into energy, water and sewerage infrastructure improvements for unconnected areas will be reliant on sustainable solutions and alternatives	Community
A4.4 amended to clarify State policies include those for boarding houses and medium density housing as well as seniors housing to align with A15.3.	Community

MRA private land owner submissions (25)

Submission summary	Response summary
<p>Development potential</p> <p>Requests from MRA land owners to consider this area for future housing including seniors living, boarding houses, low density residential and smaller lot sizes, and objections to the proposed exemptions to State Environmental Planning Policies (SEPPs) for boarding houses, seniors housing and medium density housing.</p>	<p>Significant land within the MRA and future MRA investigation area is subject to constraints including bush fire hazards and risks, other environmental constraints, distance from centres and high-frequency public transport. Council will undertake further analysis of this area as part of the local housing strategy, bush fire risk assessment, and environmental studies.</p> <p>Future zoning decisions will be subject to community consultation and reviewed by a Probity Advisor.</p>
<p>Use of private land for environmental protection</p> <p>Objections from MRA land owners to the application of restrictive Environmental Protection Zones in the new LEP, with some recommendations for rural or large lot residential zones. Some argued private land should not be used to achieve the LGA's green objectives and suggested the process by which Environmental Zones can be determined (i.e. through site inspections). Some submissions argued that land owners should be compensated due to any loss in development potential or that land be acquired by the government.</p>	<p>Environmental Protection zones are applied where the protection of the environmental significance of the land is the primary consideration. For example, the E3 Environmental Management zone can be applied to land with special cultural or aesthetic attributes or environmental hazards/processes, and the E4 Environmental Management zone can apply to land with special environmental or scenic values, and accommodate low impact residential development. The criteria for identification of Environmental zones is established by DPIE.</p> <p>Future zoning of the MRA will have regard to a range of factors consistent with the principles contained in <i>Towards 2040</i>, Council's local housing strategy, and guidance provided by DPIE. The extent of further studies required to finalise new zonings under the Northern Beaches LEP is currently being determined. When considering hazards such as flooding and bush fire, there are other legislative layers such as Ministerial Directions and the Planning for Bush Fire Protection (PBP) guidelines that require us to look at development holistically.</p> <p>It is not required in law and is not established strategic land use planning practice to compensate land owners for any financial loss resulting from rezoning. Acquisition of land is possible where an LEP reserves land for a public purpose.</p> <p>Note that P2 includes actions to investigate biodiversity offsets and options for funding, acquisition and reservation of bushland with biodiversity, habitat, recreational and scenic values, including incentives or assistance to private property owners.</p>

Change	Source
P4 principle added to encourage the spread of indigenous vegetation and tree canopy to align with objectives within the locality statements for the deferred lands	Community
A4.2 amended to clarify the LEP and DCP controls will also be informed by environmental hazards and constraints and local character studies	Community
A4.4 amended to clarify exemptions are being sought for boarding houses and medium density housing as well as seniors housing to align with A15.3	Community

Issues with Deferred Lands Planning Proposal (22)

Submission summary	Response summary
<p>Objections from MRA land owners within the deferred lands area with the Oxford Falls Valley and Belrose North Strategic Review, stating it was discredited by land owners and should not be used to determine any new zonings in the deferred areas.</p> <p>These submissions stated issues with the Warringah Biodiversity Conservation Study (WBCS). Submitters made representations that land constraint maps should only be used for their original purpose and that future zoning should be based on independent, evidence-based study based on a site inspection, appropriate sources of information and data, a review of zoning decisions by the land owner and additional further studies undertaken by land owner appointed experts.</p>	<p>The Warringah Biodiversity Conservation Study (WBCS) was not used in the preparation of the Strategic Review and Council has given previous undertakings that it would not be used to determine future zoning. The cumulative environmental constraint mapping in the Strategic Review is unrelated to the WBCS.</p> <p>Future zoning of deferred lands will have regard to a range of factors consistent with the principles contained in <i>Towards 2040</i>, Council's local housing strategy, and guidance provided by DPIE. The extent of further studies required to finalise new zonings under the Northern Beaches LEP is currently being determined.</p> <p>Future zoning decisions will be subject to community consultation.</p>
Change	Source
P4 text box amended referring to 'deferred lands' to remove reference to the Oxford Falls Valley and Belrose North Strategic Review	Community
A4.2 amended to clarify the LEP and DCP controls will not specifically be informed by recommendations from the Oxford Falls Valley and Belrose North Strategic Review	Community

P5 – Green urban environments including tree canopy, urban heat and the green grid (28)

Tree canopy loss (13)

Submission summary	Response summary
<p>Concern regarding tree canopy loss from development and associated impacts on the natural environment. There was support for the proposed tree replacement requirement and calls for increased enforcement.</p> <p>There was a suggestion for incentives for residents to protect their trees (e.g. offset on rates, subsidised maintenance of significant trees). It was also suggested that Council reference the importance of tree canopy in providing wildlife habitat and that Council encourage the use of native species. One submission queried Council's reference to the protection of 'iconic trees'.</p>	<p>Protection of tree canopy is addressed in P5 and the implementation of the Urban Tree Canopy Plan (A5.1). These studies and plans will inform new LEP and DCP controls that includes a review of existing provisions and conditions of consent to protect trees.</p> <p>P5 outlines Council's intent to manage illegal tree clearing on private land through enforcement and compliance activities. An action has been added to P2 to strengthen this commitment.</p> <p>A2.5 outlines Council's intent to investigate options for funding, acquisition and reservation of bushland with biodiversity, habitat, recreational and scenic values, including incentives or assistance to private property owners. It has been amended to include reference to urban tree canopy. A P5 principle has been amended to acknowledge tree canopy for habitat.</p>
Change	Source
A2.5 amended to include reference to urban tree canopy so that it now reads that Council will investigate options for funding, acquisition and reservation of urban tree canopy in addition to bushland with biodiversity, habitat, recreational and scenic values, including incentives or assistance to private property	Community

Submission summary	Response summary
A2.9* added to address unauthorised removal of tree canopy or native vegetation, such as through ongoing monitoring and reporting, planning controls in the LEP and DCP, increased enforcement and compliance and education programs	Community
P5 principle amended to address the importance of tree canopy for wildlife corridors and habitat in addition to connecting to the local green grid	Community
P5 principles amended to better align with wording from the Government Architect's draft Urban Tree Canopy Guide, changing the principle to 'retain mature trees and use innovative measures to do so' to 'protect, maintain and enhance the existing urban tree canopy, including mature trees'; changing the principle relating to tree diversity to 'provide a diverse range of species of varying families and genera'; and changing the principle from 'incorporate other forms of green cover where space for trees is limited' to 'Integrate the design of green, blue and grey infrastructure in support of the urban tree canopy'.	Council
P5 principle added to prioritise the use of local native species	Community
A5.1 amended to remove reference to 'iconic' trees to clarify the Urban Tree Canopy Plan will include protection of all trees	Community

Tree canopy targets (6)

Submission summary	Response summary
<p>Calls to increase tree canopy, including through the use of tree canopy targets based on updated tree canopy data.</p> <p>Suggestion that Council's target to plant 5,000 trees per year is not enough, especially when compared with the Greater Sydney initiative for one million trees.</p>	<p>P5 outlines Council's intent to investigate tree canopy targets to assist in protecting trees and mitigating tree canopy loss from development, and link to NSW Government targets to increase urban tree canopy in Greater Sydney by 2036. Targets will be established for different urban conditions based on the Government Architect's proposed targets (CBD Areas > 15%; light commercial areas > 25% and suburban areas > 40%).</p> <p>Council has now received updated LiDAR data which was a key action in the draft Urban Tree Canopy Plan. This differs from the tree canopy data referenced in the GSC's <i>Pulse of Greater Sydney 2019</i>, based on aerial photos from 2016. Council's LiDAR data will be used to inform tree canopy targets as identified in A5.2.</p> <p>P5 outlines Council's target to plant 5,000 trees which is mirrored in Council's Environment and Climate Change Strategy, <i>Protect. Create. Live.</i> and draft Urban Tree Canopy Plan. This target is a minimum prescription and has regard to the existing high tree canopy on the Northern Beaches. At this stage, no funding has been provided to Council to expand the urban tree canopy as part of the Greater Sydney initiative for one million trees.</p>

Change	Source
P5 text added to identify an overall coverage of 39% (<i>Pulse of Greater Sydney</i>) and that tree canopy varies significantly across the LGA, with low levels of urban tree canopy coverage in areas such as Queenscliff	GSC, Community
P5 text added to reference Council's work in establishing tree canopy targets using 2019 LiDAR data, considering land ownership and existing tree canopy levels and need for other measures to address urban heat in areas constrained by infrastructure	Community
P5, Figure 33* added showing the Government Architects NSW's proposed tree canopy benchmarks, which will be used to inform LGA-specific tree canopy and green cover targets in accordance with A5.2	GSC, Community
P5, Map 6* added to show the existing urban tree canopy coverage (%) of each suburb in the LGA using 2019 LiDAR data analysis of Northern Beaches	GSC, Community
Glossary amended to add definition for 'LiDAR (Light Detection and Ranging)' as is an aerial surveying method that measures distance to a target by illuminating the target with laser light and measuring the reflected light with a sensor	Community

Green urban environments and urban heat (10)

Submission summary	Response summary
<p>Recognition that tree canopy is not the only measure in order address urban heat, including support for green roofs and green walls. One submission also queried the reference to Water Sensitive Urban Design within P5.</p> <p>A submission from the Cancer Council was supportive of the many priorities that include co-benefits of natural shade in avoiding over exposure to UV radiation.</p>	<p>P5 addresses tree canopy as well as measures to address the urban heat island (UHI) effect summarised in P5, Figure 32* which include the retention of bushland and the urban tree canopy along with green cover (including green roofs and green walls) and water sensitive urban design (WSUD). P5, Map 7* shows the effect of UHI on the Northern Beaches, demonstrating highly urbanised areas such as Brookvale as being susceptible.</p> <p>A number of changes have been made in response to a submission from the Cancer Institute NSW suggesting Council mention UV radiation as a natural hazard that contributes to the high incidence of melanoma in the LGA and the importance of shade.</p>
Change	Source
P5 text added to identify UV radiation as a natural hazard, the high incidence of melanoma in the LGA and acknowledge that well-designed and correctly positioned shade from natural vegetation and built structures can reduce UV radiation	Cancer Institute NSW, Community
P5, Figure 32* amended to clarify improved building design is also a measure to address urban heat as described in the text	Community
P5, Figure 32* amended to identify protection from UV radiation, comfort in hot weather and shelter as additional benefits of tree canopy	Cancer Institute NSW, Community
P5 principle amended to reference the importance of infrastructure design in addition to building design when reducing exposure to urban heat	Community
P5 principle amended to address the need to reduce UV radiation (in addition to UHI effect) by increasing tree canopy	Cancer Institute NSW, Community
A5.2 amended to address tree canopy targets that respond to areas with high levels of UV radiation (in addition to UHI effect). Cancer Institute of NSW included as a partner.	Cancer Institute NSW, Community
A5.3 and A5.4 merged (now A5.3*) to ensure design guidelines and LEP and DCP address UV radiation (in addition to tree canopy and UHI effect). It was noted that UV radiation may be addressed by well-designed built and natural shade	Cancer Institute NSW, Community

Green grid (7)

Submission summary	Response summary
<p>Concern of impacts from the Greater Sydney Green Grid project linking the Northern Beaches Hospital to Narrabeen Lagoon.</p> <p>Calls to reduce impacts of recreation on coast and waterways and concern for impacts associated with the local green grid and Greater Sydney Green Grid Projects, especially projects listed in A1.9.</p>	<p>Sustainable recreation is addressed in both <i>Towards 2040</i> and <i>Protect. Create. Live.</i> and through implementation of the Risk-based framework pilot project with DPIE.</p> <p>A1.9 includes examples of local green grid projects that will be explored. As identified in P5, Greater Sydney Green Grid projects are subject to feasibility and environmental assessment. A5.5 outlines Council's intent to investigate the feasibility of Greater Sydney Green Grid projects together with DPIE and the NSW Government Architect.</p> <p>Note Sydney Water and the Office of Sport have asked to partner with Council on local green grid projects and the Office of Sport has requested that Council investigate opportunities for non-motorised water sports launching, storage and utilisation (A1.9e). Amendments were made to P5 text in response to the GSC Assurance process with respect to recreational access to Dee Why Lagoon.</p>
Change	Source
A1.4 amended to refer to preparing an open space and recreation strategy and map a local green grid that supports environmentally sustainable access to the coast, in addition to waterways	DPIE – Development and Transactions, Community, Office of Sport
A1.9d expanded to identify better management of existing aquatic reserves and marine estates in addition to the identification of aquatic reserves in local green grid projects	DPI Fisheries, Community

Submission summary	Response summary
A2.8* added to prepare an open space and recreation strategy and map a local green grid that supports environmentally sustainable access to bushland where appropriate. Ku-ring-gai, Hornsby, Central Coast councils; MLALC, NPWS; NSW Department of Industry (Crown Lands) listed as partners	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to GSC, DPI Fisheries, Sydney Water and Office of Sport</i>	

P6 – Open space for recreation supply, use, access and environmental impacts (41)

Open space supply (19)

Submission summary	Response summary
<p>Increase supply</p> <p>Support for more sportsgrounds, green space, parks and bike tracks to keep pace with housing growth. There was concern that Council will not have enough open space for recreation and that Council needed to safeguard these lands. The need for open space to be accessible all hours was also highlighted including when official sports were not in use. Also questions were raised on the delivery of open space for the Warriewood land release area.</p>	<p>P6 acknowledges the limited resources currently available for open space and seeks to plan for flexible open space that responds to identified trends. Council has commenced the studies identified in A6.1 (social infrastructure study and open space and recreation strategy) including a preliminary audit of open space. Updates to <i>Towards 2040</i> have been made in response to this audit.</p> <p>The expected shortfall of sports fields will be addressed by implementing Council's Sportsground Strategy (A6.3). This Strategy identifies a number of solutions such as reallocating existing grounds to maximise use, shared use of school fields and other improvements including conversion to synthetic fields. Other options for using public and green space in built up areas for recreational purposes will be considered in Council's open space and recreation strategy.</p> <p>With respect to Warriewood, the contributions plan collects for the anticipated provision and identifies a strategy for delivering the required open space.</p>
<p>Shared use</p> <p>Some submissions highlighted the opportunity for joint / shared use with schools.</p>	<p>This is addressed within P6 which supports implementation of the Sportsground Strategy including facilitating shared use of school fields (A6.3). It is included in P9 and P11 as a collaboration project with DOE, independent schools and Office of Sport. This will also be addressed in Council's open space and recreation strategy to be developed (A6.1).</p>
<p>Innovative solutions</p> <p>Queries surrounding the options mentioned in <i>Towards 2040</i> to address the undersupply of open space, including:</p> <p>Golf courses - Some support for the conversion of golf courses into more diverse uses while others outlined the need to retain these spaces for golf.</p> <p>Roof top parks – A suggestion that roof top parks should not replace on-ground parks.</p> <p>Disposal of assets and value capture - A high level of transparency and community involvement will be needed to ensure these are in the best interests of the community.</p>	<p><i>Towards 2040</i> (P6) is consistent with Council's endorsed Sportsground Strategy, which identifies conversion of single-use open space to multi-functional spaces, including increased sport and recreation use of golf courses.</p> <p>The suggestion of rooftop parks is one of many solutions identified in the social infrastructure study – issues and opportunities background paper to address the expected shortfall.</p> <p>Any decisions involving disposal of assets and value capture will be subject to community involvement and Council approval, and informed by a property strategy, to be developed in A11.2.</p> <p>The Office of Sport suggested that Council updated actions to reference innovative sports facility inclusion in new development and green, active recreation and/or sports facilities on rooftops.</p>
Change	Source
P6 text, Map 8* and Figure 34 amended to describe new open space categories from the preliminary open space audit, including private open space (e.g. courts and golf courses)	GSC, Council, Community
P6, Map 8* amended to identify school fields that may provide future shared use opportunities	GSC, Community
P6 principle added to ensure no net loss of public open space	Community

Submission summary	Response summary
See also NSW Government Agency submissions and responses for changes made in response to Office of Sport	

Open space use and infrastructure requirements (19)

Submission summary	Response summary
<p>Use</p> <p>Submissions raised the need for Council to recognise and cater for specific uses including: orienteering, slacklining, mountain biking, outdoor gyms, walking, cycling and dog exercise areas. There were also calls for innovative playgrounds and spaces for families.</p>	<p>Planning for high quality and diverse open space is addressed in P6 and A6.1, which includes preparation of an open space and recreation strategy to be developed. This will address active and passive use of open space including playgrounds and mountain biking. Council is also preparing a dog policy to be placed on public exhibition in the near future.</p> <p>Community engagement will be an integral part of this work, and interested parties have the opportunity to sign up for regular updates about current community engagement undertakings.</p>
<p>Infrastructure</p> <p>Calls for toilets, taps and water stations to be available at every park and outdoor sporting facility in order to deter single use plastic. One submission raised concerns with commuter parking on Kitchener and Beeby Parks restricting the usage of the ovals, tennis courts, the Scout and Guide halls and skate park in Mona Vale.</p>	<p>Infrastructure associated with open space for recreation will be considered in the open space and recreation strategy (A6.1). This will include parking, toilets, water stations and other facilities. See also Council's response to submissions relating to parking in P21.</p>
<p>Change</p> <p>No changes in response to submissions</p>	<p>Source</p> <p>NA</p>

Access to open space (2)

Submission summary	Response summary
<p>Need for green space in high and medium density areas and query as to how Council will address principle to locate all new development within 400m / 200m open space.</p>	<p>The requirement for new residential development to be located within 400m of open space and high density areas within 200m of open space, is included in <i>Towards 2040</i> as a principle (P6 and P15). This does not mean that new open space must be provided, if there is appropriate access to existing open space. It is consistent with <i>District Plan Action 72</i>.</p> <p>Note that changes to text, maps and infographics have been made in response to feedback from the GSC Assurance process including a description and maps of areas the LGA with poor access to open space based on the 400m and 200m benchmarks.</p>
<p>Change</p> <p>P6 principle amended to clarify that Council must ensure new residential development is located within 400m of open space and high density areas within 200m of open space, rather than locate new development within these benchmarks</p> <p>See also NSW Government Agency submissions and responses for changes made in response to GSC and NSLHD</p>	<p>Source</p> <p>Community</p>

Environmental impacts from recreation (8)

Submission summary	Response summary
<p>Concern increased active recreation will encroach and negatively impact natural areas, with requests that no bushland be cleared to provide open space. The importance of these areas for providing habitat was noted, along with the need to better manage and protect these areas.</p> <p>There was concern that LGA's natural areas draw people from outside of the LGA, increasing pressure on these assets.</p>	<p>P6 identifies that the LGA's open space comprises of different categories that cater for both active and passive uses, including natural areas that are primarily protected for conservation. P6 includes a principle to ensure access to natural open space and waterways is sustainable so that these areas are preserved for the future. The need to address the expected shortfall in sportsgrounds will need to be balanced with P1 and P2 to protect and enhance the LGA'S coast, waterways, bushland and biodiversity.</p> <p>P6 also acknowledges that the LGA contains regional open space such as beaches that attract visitors from outside the area. The increased demand on these resources is being considered in Council's social infrastructure and open space study and an open space and recreation strategy to be prepared (A6.1). It is also a consideration for the destination management plan (A29.1).</p> <p>Note a number of changes have been made in response to submissions from the Office of Sport.</p>
Change	Source
P2 principle added to protect and enhance sustainable recreation in bushland reserves and natural areas without compromising the integrity of environmentally sensitive areas	Community
A2.8* added to prepare an open space and recreation strategy and map a local green grid that supports environmentally sustainable access to bushland where appropriate. Ku-ring-gai, Hornsby, Central Coast councils; MLALC, NPWS; NSW Department of Industry (Crown Lands) listed as partners	Community
A6.2 amended to clarify that the use of environmental protection zones will be used to manage conflicts between recreation impacts on the environment, rather than creating conflicts	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to Office of Sport</i>	

P7 – Sustainable development, energy, water and waste efficiency (49)

Sustainable development including buildings and infrastructure (15)

Submission summary	Response summary
<p>Support for improved building standards, including measures that exceed government standards. This included recommendations to implement high standards from 2020, a regular review of BASIX and incentivising NatHERs and passive design principles. Some submissions requested to expand the requirement for sustainable building certification identified in A7.3 to a broader area. There was support for buildings to better manage water, waste and ventilation, to incorporate solar and for efficient smaller dwellings.</p>	<p>This is addressed in P7 which supports energy, water and waste efficiency. A7.2 outlines Council's intent is to identify opportunities for better building standards and retrofits that address the principles identified in P7 in the environment study, employment study and local housing strategy, which may consider incentives. A7.3 outlines Council's intent to develop LEP and DCP controls to improve energy, water and waste efficiency and require sustainability certification for new buildings in strategic centres, employment hubs and areas subject to urban intensification. A7.4 seeks to work with NSW Government and industry to improve building standards and support the push for net zero carbon buildings.</p> <p>NaTHERS is now part of the National Construction Code that has major changes being mandated in June 2020. Current work on a planning pathway to sustainable buildings will result in a submission to DPIE for legislative changes including BASIX. This work is being led by City of Sydney and involves a broad range of property, agency and government stakeholders including Northern Beaches Council. It is due to be finalised in March 2020.</p> <p>P7 was amended to include commitments from Council's Environment and Climate Change Strategy, <i>Protect. Create. Live.</i>, which includes</p>

Submission summary	Response summary
	all suitable Council sites to be powered by renewable energy (2030) and 50% of suitable premises with solar panels installed (2030).
Change	Source
P7, Figure 36* added to reference <i>Protect. Create. Live.</i> resource commitments for both Council and the community with respect to use of renewable energy, carbon emissions, diversion of waste from landfill, construction waste, reduction in drinking water use, reducing the rate of waste generation per person, reducing single use plastics and net zero emissions	GSC, EPA, Community
P7, Figure 39* amended to clarify Council is seeking sustainability certification for new developments, not just buildings as described in A7.3	Community
P7, Figure 39* amended to clarify that Council is seeking sustainable solutions for energy, water and sewerage infrastructure, not simply improvements for unconnected areas as clarified in A4.3.	Community
A7.3 amended to clarify the types of independent sustainability certification required for strategic centres, employment hubs and areas subject to urban intensification to add reference to Passive House in addition to the Green Star rating tool with a threshold to be developed. Reference to NABERS has been removed as it is now part of the National Construction Code with major changes being mandated in June 2020. The term 'buildings' has been changed to 'developments' to ensure this covers fit-outs and infrastructure	Community

Energy efficiency, carbon emissions and targets (27)

Submission summary	Response summary
<p>These submissions included calls for Council to lead the way by becoming carbon neutral as early as 2024 and adopting a zero emissions blueprint. Support was expressed for measures to reduce carbon emissions including sustainable transport, renewable energy, solar panels and batteries, community solar and micro-grids and solar farms.</p> <p>Once submission suggested the term 'low-carbon community' in P7 is misleading as readers may interpret low-carbon as low carbon production, rather than a 'low-carbon dioxide producing community'.</p>	<p>Council's Environment and Climate Change Strategy, <i>Protect. Create. Live.</i> outlines Council's aspiration for new zero emissions by 2030, net zero Council operations by 2045 and net zero community emissions by 2050. These have been added to <i>Towards 2040</i> and will be supported by action plans identified in A7.5.</p> <p>With respect to sustainable transport, P7 focuses on reducing carbon emissions and a number of priorities in <i>Towards 2040</i> outline initiatives aimed at reducing dependence on cars, including locating new development close to public transport (P15), improving public transport (P19), and promoting active travel (P20). TfNSW have asked Council to reference these measures as demand management initiatives to align with <i>Future Transport 2056</i>.</p> <p>P7 includes principles and content to support the increase in uptake of renewable energy, including support for precinct-scale efficiencies such as sharing renewable energy across several buildings. A number of changes have been made to strengthen this support.</p> <p>The term 'low-carbon community' refers to communities with a low reliance on carbon-intensive sources i.e. fossil fuels and therefore have lower carbon-dioxide emissions. The glossary includes a definition for 'low-carbon-high efficiency precincts' which clarifies this matter.</p>
Change	Source
A7.2 amended to identify opportunities for renewable energy in the environment study, employment study and local housing strategy, with timing updated to ongoing	DPIE – Development and Transactions, Community
<i>See also NSW Government Agency submissions and responses for changes made in response to TfNSW</i>	

Waste management, single use plastics and recycling (16)

Submission summary	Response summary
<p>These submissions requested clarification on Council's waste services, including processes for food waste where waste and recycling goes.</p> <p>There was strong support for the elimination of single-use plastics, including plastic bags and coffee cups including at Council events.</p> <p>Submissions also supported actions to reduce, reuse and recycle waste including education and workshops. Support was also expressed for community gardens and space for composting.</p>	<p>As part of <i>Protect. Create. Live.</i>, Council will develop action plans for sustainable living (A7.5), waterways and catchments and coast (A1.5). These plans commit to minimising the use of single use plastics which includes disposable items by promoting use of reusable items and actively working to keep single use plastics out of waterways and catchment networks and coasts. <i>Protect. Create. Live.</i> also includes commitments for an 85% diversion of waste from landfill (2040) and reducing the rate of waste generation per person (2040).</p> <p>Council's new waste service that commenced 1 July 2019 uses advanced technology that recovers food and organics from red garbage bins to process into compost material and reduce the amount of waste going to landfill. Council also enforces the Event Waste Management Guidelines which provides information on how to reduce and minimise waste for any Council-approved event.</p> <p>With respect to waste management, a number of changes have been made throughout the document to reference the circular economy and waste infrastructure in response to both the GSC and EPA.</p>

Change	Source
<p>P7, Figure 36* added to reference <i>Protect. Create. Live.</i> resource commitments for both Council and the community with respect to use of renewable energy, carbon emissions, diversion of waste from landfill, construction waste, reduction in drinking water use, reducing the rate of waste generation per person, reducing single use plastics and net zero emissions</p>	<p>GSC, EPA, Community</p>
<p>P9 principle amended to ensure new and upgraded infrastructure contributes to the circular economy and considers whole of life cycle costs in addition to being efficient and flexible to adapt to long-term needs</p>	<p>EPA, Community</p>
<p>P21, Map 25* amended to show waste facilities in relation to the LGA supported by a text box. This is supported by actions in P21 which relate to urban freight, which includes responding to increased waste collections</p>	<p>EPA, Community</p>
<p><i>See also NSW Government Agency submissions and responses for changes made in response to EPA and GSC.</i></p>	

Water supply and support for water recycling (9)

Submission summary	Response summary
<p>Concern there is inadequate water infrastructure and calls to enhance the LGA's resilience with regards to water supply. Support was expressed for water harvesting, increased rainwater storage and use of recycled water including sewerage.</p> <p>The opportunity to upgrade sewerage plants at Warriewood and North Head for recycling was mentioned along with the potential to better utilise water from Manly Dam.</p>	<p>P7 outlines Council's intent to be highly efficient in water use, with an emphasis to improve efficiencies in the built environment. P1 details Council's support for integrated water cycle management and identifies the need to reduce demand on the drinking water supply with principles to integrate water sensitive urban design into the built form and encourage water efficiency, water re-use or alternative water sources to reduce potable water use. P4 also outlines Council's intent to investigate sustainable solutions for water and sewerage infrastructure for unconnected areas in the MRA (A4.3).</p> <p>A7.2 includes identifying opportunities for improved efficiency through the environment strategy which covers both seeking other sources of water to reduce community drinking water use and looking at rainwater capture through land-use planning and development controls. <i>State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 (BASIX SEPP)</i> requires all new residential buildings to identify sustainability improvements that are most commonly achieved via rainwater tanks. Council are working with DPIE to investigate opportunities to increase BASIX targets in key precincts (A7.4).</p> <p>Council is working with Sydney Water on the Eastern Sydney Regional Master Plan project which will look to address water supply. Council has also partnered with Sydney Water to tackle the drought with a new partnership that will help local businesses and residents in strata buildings find water-saving opportunities.</p>

Submission summary	Response summary
	A number of changes have been made to add more references to water sensitive urban design and integrated water cycle management in response to submissions from the EPA and Sydney Water.
Change	Source
P1, Figure 26 amended to clarify the hydrological / blue grid for waterways includes groundwater aquifers (not included in the map) and change 'stormwater infrastructure' to 'water infrastructure' (for example, stormwater, potable water, grey water recycling systems) in recognition of integrated water cycle management	Council
A1.11* added to acknowledge the collaborative work between Sydney Water and Council to develop the Eastern Sydney Regional Master Plan to address: resilience in the Northern Beaches water supply, requirements for new and upgraded infrastructure, wet weather overflows in priority catchments, outflows from Warriewood and North Head Wastewater Treatment Plants, opportunities for recycled water, and environmental assessment processes and outcomes. Sydney Water was added as a partner for this action.	Sydney Water, EPA, Community
P7 principle added to increase alternative water supplies to decrease dependency on distributed potable water	Community

P8 – Natural and urban hazards, bush fire and climate change (35)

Bush fire hazards and management (12)

Submission summary	Response summary
<p>Submissions raised the need for better bush fire land management and the need to implement strategies to protect and enhance biodiversity and improve resilience.</p> <p>Concern was raised of biodiversity loss from hazard risk reduction and loss of bushland to Asset Protection Zones (APZs). The need to upgrade water supply was also mentioned to assist in bush fire fighting and ensure adequate supply during bush fires.</p> <p>It was also noted the significant bush fire constraints that exist for land in the MRA. There was a question of the relevance of the National Bush Fire Danger Rating with respect to identifying high risk fire precincts (A8.1).</p>	<p>P8 outlines Council's principles and actions in planning for natural hazards including bush fire. Environmental impacts associated with hazard reduction are addressed in NSW bush fire legislation which covers a number of bush fire mitigation measures including prescribed burning, manual and mechanical fuel removal and asset protection zones.</p> <p>Principles within <i>Towards 2040</i> recognise the need to balance urban tree canopy programs and bushland restoration with natural hazard risk. When preparing the new LEP, Council will consider <i>Planning for Bush fire Protection</i> (PBP), which includes consideration of issues such as water supply. In response to a submission from NSW RFS, P8 has been updated to reflect the strategic planning principles of PBP.</p> <p>The action A8.1 to identify high-risk bush fire prone precincts in response to the National Fire Danger Rating System has been amended to better reflect Council's current work in finalising the Bush Fire Prone Land Map and proposed studies.</p>
Change	Source
P4 text amended to describe the large extent of the MRA identified as bush fire prone land as outlined in Figure 31*	Community
P4 principle added to ensure development is not intensified in areas where there is unacceptable risk to human life and property from hazards such as bush fire, to reiterate existing principles in P8	Community
P8, Map 11* amended to show more detailed flood prone mapping and bush fire prone land mapping	Community
A8.1 amended to outline proposed bush fire studies to inform the new LEP including completion of the Bush Fire Prone Land Map and plans to undertake a Strategic Bush fire Risk Assessment in accordance with Planning for Bush Fire Protection (PBP). NSW RFS was added as a partner	NSW RFS, Community
P9 principle added to ensure infrastructure upgrades address impacts from climate change, including exposure to UV radiation and urban heat, sea-level rise and increased incidence of bush fire, flooding and storm surges	Cancer Institute NSW, GSC, Community

Submission summary	Response summary
See also NSW Government Agency submissions and responses for changes made in response to NSW RFS	

Climate change, natural hazards and climate emergency (22)

Submission summary	Response summary
<p>Support for Council action</p> <p>Submissions supporting Council's declaration of a climate emergency, and <i>Protect. Create. Live.</i> as a proactive direction on climate change. Some submissions outlined this should be Council's top priority, requesting to also reference the biodiversity emergency, the increased dangers from bush fires and sea level rise, with some suggesting a need to phase out development in areas most vulnerable to natural hazard risks (e.g. beaches, estuaries, lagoons). Also recognised was the need to maintain and improve urban tree canopy cover to ameliorate the effects of the Urban Heat Island (UHI) effect.</p>	<p>P8 has been amended to reference the Northern Beaches Council resolution on 27 August 2019 to declare a state of Climate Emergency along with over 900 jurisdictions worldwide, including 35 Australian councils.</p> <p>P8 outlines Council's principles and actions in planning for a changing climate, recognising exposure to natural hazards will increase, including heatwaves, heavy rainfall and severe bush fire conditions, as well as storm surges, sea-level rise and increased flooding that will affect properties and infrastructure along the coast. P5 addresses the need for green urban environments in order to combat the urban heat island (UHI) effect.</p> <p>P8 includes actions to identify where to limit intensification of development in areas subject to hazards (A8.2) and develop controls to restrict development in these areas (A8.3*). This is another reason why Council is seeking exemptions to State Environmental Planning Policies (SEPPs) for boarding houses, seniors housing and medium density housing (Actions 2.2, 4.4, 15.3, 16.5), to ensure unsuitable development doesn't occur within areas exposed to natural and urban hazards. A8.4 requires the investigation of a natural hazards and resilience framework to address long-term natural hazard and climate-related risk across the Northern Beaches.</p>
<p>Objections to Council action</p> <p>Some submissions objected to Council's declaration of a climate emergency and sustainability focus, for reasons including impacts on the economy, private land owners and need to instead focus on lifestyle of residents.</p>	<p>The declaration of a Climate Emergency reflects community sentiment articulated in Council's adopted Community Strategic Plan, <i>Shape 2028</i>. This Plan acknowledges climate change will continue to impact our environment and demands urgent local and global action.</p>
Change	Source
P8 text added to reference the Northern Beaches Council resolution to declare a state of Climate Emergency on 27 August 2019	Community
P8, Map 11* amended to show more detailed flood prone mapping and bush fire prone land mapping	Community
P8 principle added with respect to managing risks associated with sea-level rise for coastlines and beach landscapes	Community
A8.3 amended to add reference to flood mapping when discussing constraints mapping that will influence LEP and DCP controls to restrict development in high-risk hazard areas	Community
P9 principle added to ensure infrastructure upgrades address impacts from climate change, including exposure to UV radiation and urban heat, sea-level rise and increased incidence of bush fire, flooding and storm surges	Cancer Institute NSW, GSC, Community
<i>See also changes in response to UV radiation and urban heat (P5) and bush fire (P8) which also address natural hazards</i>	
<i>See also NSW Government Agency submissions and responses for changes made in response to Cancer Institute NSW</i>	

Resilience and food supply (5)

Submission summary	Response summary
<p>Resilience and food supply (5)</p> <p>Queries were made as to how Council would address 'chronic stresses' and 'acute shocks'. Suggestions were made to increase resilience by addressing food supply.</p> <p>A request was made to reference the Office of Emergency Management in the current 'Get Ready Northern Beaches' project.</p>	<p>P8 addresses resilience aligning with Resilient Sydney's definition of 'resilience', which includes chronic stresses and acute shocks such as pollution, disease, cyber or terror attacks and social unrest.</p> <p>With respect to food supply, P4 identifies that the MRA supports a variety of land uses including small scale agriculture enterprises and is supported by a principle to support sustainable primary industry in the MRA, particularly food production.</p> <p>P12 also includes a principles to encourage fresh food production in urban areas, such as community gardens private gardens, rooftop gardens and verge gardens. This is supported by A12.4* to develop new LEP and DCP controls for fresh food production in urban areas.</p>
Change	Source
A8.4 amended to clarify the natural hazards and resilience framework will address chronic stresses and acute shocks including but not limited to sea-level rise, natural hazards and climate-related risks across the Northern Beaches	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to NSLHD</i>	

Urban hazards including air, noise and light pollution (5)

Submission summary	Response summary
<p>Community submissions concerned with the impact of noise with population growth, air quality especially from wood smoke and the Beaches Link Tunnel, bush fire smoke haze from climate change, impacts from businesses causing air and water pollution and associated impacts on waterways and light pollution including street lighting and associated impacts on humans and animals.</p>	<p>P8 address Council's commitment to build resilience in the community and natural and built environments. Principles within this priority refer to both 'natural and urban hazards', with the <i>Towards 2040</i> glossary defining 'urban hazards' as those resulting from past and present urban activities such as noise, air pollution and soil contamination'.</p> <p>Although <i>Towards 2040</i> identifies noise pollution with respect to freight corridors and late-night activities, it is not made exactly clear within the priority title that Council is referring to both 'natural and urban hazards'. Also, <i>Towards 2040</i> does not outline the work Council is aiming to address within the new planning framework to address urban hazards and environmental health issues, such as air quality, noise pollution, asbestos, water pollution, soil contamination, disease, wastewater overflows, illegal dumping, construction sites and ongoing use of buildings. A number of changes have been made throughout the document to better address urban hazards and Council's work in this space.</p>
Change	Source
P8 priority heading amended to 'Adapted to the impacts of natural and urban hazards and climate change' to clarify this Priority addresses both natural and urban hazards. P8 text also amended to clarify that it addresses urban hazards	GSC, Community
P8 text added referencing implementation of NSW Wood Smoke Reduction Program. Note: further changes to text box relate to presentation purposes	EPA, GSC, Community
P8 text amended to ensure it references both natural and urban hazards, describe urban hazards in the LGA (including water, air and noise pollution and soil and groundwater contamination) and describe Council's work to minimise the generation of air and noise pollution and soil and groundwater contamination and its discharge into the environment	EPA, GSC, Community
P8, Map 11* amended to show wastewater in close proximity to waterways and coast and employment lands with risk of stormwater contamination	EPA, GSC, Community
P8 principle added to minimise water, air and noise pollution, soil and groundwater contamination and its discharge into the environment	EPA, GSC, Community
P8 principle added to minimise adverse impacts from development in environmentally sensitive areas	GSC, Community

Submission summary	Response summary
A8.8* added to develop Council policy and LEP and DCP controls to ensure best practice environmental management of stormwater, air, noise and light pollution, and soil and groundwater contamination to minimise hazards and pollution, for example by managing wood heaters, asbestos, animals, smoking, and construction management including dewatering. EPA added as partner	EPA, GSC, Community
A8.9* added to investigate the establishment of a baseline and ongoing monitoring for specific water, noise and air pollution sources, including metal and hydrocarbons in recreational waterways and vector borne illness (i.e. mosquitoes). EPA added as partner	EPA, GSC, Community
A8.10* added to investigate mechanisms to minimise the incidence of illegal dumping and land clearing using advanced technologies, increased enforcement and compliance and/or education programs. EPA added as partner	EPA, GSC, Community
A8.11* added (moved from A7.6), as the action to investigate Australia's first Urban Night Sky Place in Palm Beach more addresses light pollution than energy efficiency (although it is relevant to both)	Council, Community

Infrastructure and collaboration – written public submission issues and responses

Note: The numbered actions, figures and maps marked with an asterisk reference the version of *Towards 2040* as presented to the Council meeting 25 February 2020.

P9 – Infrastructure deficit, delivery and financing, population growth and collaboration (103)

Community engagement (19)

Submission summary	Response summary
<p>Some submissions raised concerns that there was insufficient community engagement for <i>Towards 2040</i> and complained that the rates notice was received after the consultation sessions had taken place.</p> <p>Some submissions however expressed support for the public exhibition process.</p> <p>Concern was raised regarding the agendas of activist groups and transparency and that Council would not adequately consider the suggestions of those who were against the amalgamation.</p> <p>Also expressed by some was distrust of Council community consultation and questions as to whether the actions would be implemented.</p>	<p><i>Towards 2040</i> was exhibited for six weeks, exceeding the 28 day requirement. During this time, five drop-in sessions were held including one in the evening, and one weekend session. Hard copies of <i>Towards 2040</i> were available at customer service and library locations, with the project team available via phone throughout the exhibition period.</p> <p>Flyers were included in Council's rates notices and <i>Towards 2040</i> was advertised in three local newspapers and on Council's website, social media pages and community engagement newsletter.</p> <p>Community engagement during exhibition of <i>Towards 2040</i> aimed to involve a cross-section of the community, including age, gender, and location. Each submission received during the exhibition period has been considered.</p> <p>A number of the actions in <i>Towards 2040</i> involve projects that will include community engagement, including the preparation of a new LEP and DCP. Council has recently adopted the Community Participation Plan that outlines the requirements and level of participation for planning processes including Local Strategic Planning Statements.</p> <p>The implementation and measures section of <i>Towards 2040</i> outline how the plan will be implemented and monitored.</p>
Change	Source
A9.5 and A12.3 deleted and A13.4 amended as they referred to the preparation of a Community Participation Plan which is now complete (now referred to in Figure 21 and implementation section)	Community
Implementation text amended to clarify the role of community engagement and make reference to implementation of the CPP as ongoing	Community

Site specific zoning requests (19)

Submission summary	Response summary
<p>A number of submissions were received from property owners requesting rezoning specific sites. These submissions were mostly by planning consultants, on behalf of a number of property owners, including not for profit and religious organisations. These requests were for sites within Balgowlah, Allambie Heights, Collaroy Plateau, Mona Vale, Cromer Industrial Area, Dee Why, Collaroy, Belrose, Manly, Manly Vale, Brookvale, Frenchs Forest Business Park and Freshwater.</p>	<p><i>Towards 2040</i> is a strategic document that establishes planning priorities and principles to guide land use planning decisions. It does not address planning outcomes on a site specific basis such as specific change to the land use zone or other development controls.</p> <p>A22.1 calls for the completion of the LGA wide employment study and A15.1 seeks to prepare and implement a local housing strategy. These documents will recommend where growth in housing and employment can best occur and will inform the new LEP and DCP.</p> <p>The housing investigation areas in <i>Towards 2040</i> are high-level and reflect the work done on the local housing strategy to date. The identified areas take into consideration the housing principles identified in P15. Further detail on housing will be provided in the local housing strategy which will be subject to a separate engagement process with the community.</p>

Submission summary	Response summary
	<p>After finalisation of <i>Towards 2040</i>, Council will develop the Northern Beaches LEP and DCP. These documents will provide the detailed planning provisions for all land in the LGA. Site specific changes to planning provisions must be addressed through the development of the LEP and DCP. This will include community engagement and will afford the community the opportunity to make a case for site specific changes.</p> <p>Any such changes must demonstrate they meet the strategic directions set out in <i>Towards 2040</i> and recommendations of technical studies that are being completed to support the new planning controls.</p> <p>Future zoning decisions will be subject to community consultation and reviewed by a Probity Advisor. As outlined in A9.7*, Council will also be investigating new funding mechanisms such as value capture where any increase in development potential is acquired. This will help Council fund and address the current infrastructure deficit.</p> <p>As these submissions are site specific they raise no issues that require change to <i>Towards 2040</i>. Should the owners of these sites wish to progress an application for redevelopment of the site they are able to do so through the current planning proposal and / or the DA lodgement process</p>
Change	Source
No changes in response to submissions	NA

Spot rezoning (12)

Submission summary	Response summary
<p>Some submissions raised concerns with spot rezoning, suggesting Council advocate for changes to legislation to prevent these types of developments.</p> <p>Some submissions however were supportive of spot rezoning due to the potential to unlock housing capacity in areas not previously identified for residential development. These submissions were generally from major property owners including religious organisations.</p>	<p>The principles set out in <i>Towards 2040</i> guide where and how the LGA will grow, and will be addressed in the technical studies and subsequent planning controls. <i>Towards 2040</i> is intended to reduce potential for spot rezonings, through identifying where and how growth in the LGA will be managed.</p> <p>The <i>Environmental Planning and Assessment Act 1979</i> enables planning proposals to be made to change Council's planning instruments, including changes to land use zoning. Processes were introduced by the NSW Government to allow land owner led planning proposals to be determined/reviewed by Local Planning Panels where councils had not made a determination within a prescribed period of time, or where a planning proposal request was unsupported.</p> <p>Council cannot override current planning legislation that allows proponents to lodge applications for spot rezoning. Any future applications for spot rezoning will be assessed against the strategic directions set out in <i>Towards 2040</i> together with other relevant legislative considerations.</p>
Change	Source
No changes in response to submissions	NA

Infrastructure deficit (15)

Submission summary	Response summary
<p>These submissions raised the need for infrastructure to be provided before housing and employment growth, stating there is an existing infrastructure deficit that needs to be addressed before accommodating more people. It was suggested <i>Towards 2040</i> should</p>	<p>Whilst aligning infrastructure with forecast growth is important, we recognise that there are existing infrastructure challenges that need to be addressed.</p> <p>Priority 9 seeks to plan for a Northern Beaches supported by infrastructure, together with a number of priorities throughout the document and actions to prepare studies that address both existing</p>

Submission summary	Response summary
be stronger on this matter, or that parts be reworded to prioritise planning for the existing population rather than future residents.	and projected infrastructure needs. These studies include housing, employment, social infrastructure and transport. They also include an LGA-wide land use infrastructure implementation plan which will set out a plan for funding and timing for delivery of all types of infrastructure as the population grows (A9.1).
Change	Source
No changes in response to submissions	NA

Population growth (27)

Submission summary	Response summary
Most of these submissions were unresponsive of population growth, overdevelopment and increased density due to impacts on the environment, lifestyle and concerns that infrastructure is currently inadequate, especially transport infrastructure. One submission suggested that planning for 40,000 new residents was inadequate and that Council should plan for more.	<i>Towards 2040</i> is a document that seeks to guide growth and development at a local level as determined by demographic trends and projections. Ecologically sustainable development and growth coupled with appropriate infrastructure are at the core of the document. Changes have been made in response to the GSC Assurance process where they identified a misalignment between the <i>Towards 2040</i> housing numbers to 2036 and the numbers released by the GSC, producing a discrepancy of 6,235. See 'housing supply' in P15 for further discussion.
Change	Source
Strategic context text, Figure 7 and Figure 18 amended to change the additional housing demand from 11,200 to 11,747, increasing the estimated demand from +7,865 to +8,347 (Figure 7), to align with updated data from the research into the local housing strategy	Council
<i>See also changes relating to P15 - Housing supply</i>	

Infrastructure delivery including utilities (15)

Submission summary	Response summary
Some submissions were supportive of the priority to ensure population growth is matched by infrastructure and highlighted the need for infrastructure to be maintained over time. It was suggested the infrastructure needed to be smarter and sustainable and built for longevity. The need for Council to plan for all types of infrastructure was addressed, including sewerage services, water, telephone and internet services, garbage and waste services, roads, electricity and gas.	P9 highlights Council's intent for new and upgraded infrastructure to be efficient and flexible and adapt to long-term needs. P7 also includes a principle to support smart technology for improved efficiency. A principle in P9 was amended to ensure infrastructure contributes to the circular economy and considers whole life costs. P9 seeks to ensure that provision of infrastructure accompanies growth in the housing and employment sectors in areas where urban renewal is occurring. The development of an LGA-wide land use infrastructure implementation plan will look to align all types of infrastructure planning with growth, based on housing, employment and social infrastructure studies and additional studies as required (A9.1).
Change	Source
P9 text amended to change reference from 'growth infrastructure compacts' to 'place based infrastructure compacts' to reflect NSW Government changes to term. Glossary amended.	Community
P9 principle amended to ensure new and upgraded infrastructure contributes to the circular economy and considers whole of life cycle costs in addition to being efficient and flexible to adapt to long-term needs	EPA, Community, GSC
P9 principle amended to clarify infrastructure assessment must address social and transport infrastructure. This aligns with the existing principle in the managing growth and change section	Council
Glossary amended to replace 'growth infrastructure compact' with 'place-based infrastructure compact', to align with new policy released by the NSW Government	Community

Financing infrastructure provision, privatisation and public private partnerships (3)

Submission summary	Response summary
<p>Submissions raised concerns that the commitments in <i>Towards 2040</i> would increase contributions and costs associated with new development and impact on development feasibility and affordable housing. The need for transparency around infrastructure funding and contributions was highlighted.</p> <p>There was support for the proposed use of value capture and caution to avoid moving assets from public to private control.</p> <p>Some submissions raised concerns with public-private partnerships (PPPs) for infrastructure delivery, highlighting reported issues with the new Northern Beaches Hospital.</p>	<p>For the new LEP and local housing strategy, an LGA-wide land use and infrastructure implementation plan will be undertaken and inform any reviews of council's contributions plans (A9.8*). Contributions plans will ensure that local infrastructure funding and delivery is transparent and equitable, and include the consideration of development feasibility.</p> <p>A9.7* seeks to investigate new funding mechanisms such as value capture. This would have the intent of sharing any land value uplift resulting from unzoning so that it can be shared with the community through public benefit.</p> <p>Council also aims to seek extra funding by working with the NSW government to permit an increase to maximum permitted development contributions under Section 7.11 of the EP&A Act, including for green and sustainable infrastructure (9.5*). The sale and/or disposal of any Council-owned asset is subject to a separate process involving community consultation, and informed by a property strategy, to be developed in A11.2.</p> <p>Public-private partnerships could relate to a large range and scale of developments and would be subject to individual endorsement of the Northern Beaches Council. The Northern Beaches Hospital PPP was undertaken at a State Government (not Council) level and should not be used as the sole reason to limit the potential to consider their suitability in the future.</p>
Change	Source
<p>See also NSW Government Agency submissions and responses for changes made in response to TfNSW and Cancer Institute NSW</p>	

Collaboration and participation for infrastructure delivery (5)

Submission summary	Response summary
<p>Several submissions noted the need for better collaboration with the NSW Government and the importance of ensuring their infrastructure and priorities and budget align with Council.</p> <p>There was also concern that the facilitation process for infrastructure delivery is not transparent and the community is not involved.</p>	<p><i>Towards 2040</i> identifies relevant partners for each action including NSW Government agencies as well as certain associations and organisations. Through the GSC's Assurance Process, Council has received comprehensive feedback from over 16 NSW Government agencies, including requests to partner with Council on certain actions.</p> <p>Consultation on infrastructure delivered by other agencies is outside the control of Council, however Council continues to work closely with relevant NSW Government agencies to advocate for the interests and priorities of our community to ensure improved outcomes. Community involvement processes for infrastructure delivery led by Council will be informed by Council's adopted Community Participation Plan.</p>
Change	Source
<p>In response to submissions, the following agencies and organisations have been added as a partner to actions throughout <i>Towards 2040</i>: DPI Fisheries, Sydney Water, EPA, TfNSW, Office of Sport, Cancer Institute NSW, NSW RFS, Create NSW, State Library, Cemeteries and Crematoria NSW, Northern Sydney Local Health District (NSLHD), State Libraries, Australian Library Information Association, Heritage DPC and MLALC</p>	<p>Various</p>
<p>A9.5 deleted as it referred to the preparation of a Community Participation Plan which is now complete (now referred to in Figure 21 and implementation section)</p>	<p>Community</p>
<p>Implementation text amended to clarify the role of community engagement and make reference to implementation of the CPP as ongoing</p>	<p>Community</p>

Liveability – written public submission issues and responses

Note: The numbered actions, figures and maps marked with an asterisk reference the version of *Towards 2040* as presented to the Council meeting 25 February 2020.

P10 – Education including schools, tertiary education and university (34)

School supply and standards (9)

Submission summary	Response summary
<p>Submissions raised the need to deliver more schools, especially in Mona Vale and Warriewood and improve the standard. There was a suggestion to convert demountables into permanent zero carbon buildings and one suggestion that schools should be more vertical.</p>	<p>Planning for schools is addressed in P10 and A10.2 outlines Council's commitment to work with the NSW Government and independent schools to respond to the expected increase in school students.</p> <p>The standard of schools with respect to buildings and performance is a NSW Government matter. Planning controls are generally set out in <i>State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017</i> which includes design quality principles.</p> <p>See also the discussion on schools in P23 – Frenchs Forest.</p>
Change	Source
No changes in response to submissions	NA

Proposed university and tertiary education needs (25)

Submission summary	Response summary
<p>Those who supported the university noted the limited availability of tertiary education opportunities on the Northern Beaches and highlighted opportunities to align with specialisations including with the Northern Beaches.</p> <p>Reasons for objections included inadequate supporting infrastructure and a decrease in demand for universities as well as preferences to focus on more targeted educational and vocational opportunities instead such as TAFE.</p>	<p>P10 seeks to establish world-class education facilities, including a university. The Northern Beaches will see many young people transition from high school to tertiary education over the next 20 years, increasing demand for tertiary education which is addressed in P10. It also identifies that the Northern Beaches population has lower tertiary education rates than Greater Sydney and access to universities is limited. Council's support for the establishment of a university is that it be located in a strategic centre close to high-frequency public transport, with supporting infrastructure including student housing or affordable housing. Any proposals for a university would need to demonstrate they achieve these requirements.</p> <p>The exact nature of the education facilities, or potential university will largely be driven by market demand and changing models of education facilities, such as communal learning facilities which are referenced in A10.3. Viability of any new facility is not a relevant consideration for Council. For Frenchs Forest, Council is liaising with the DOE on the matter and will consider a university presence that best meets the needs of the LGA.</p> <p>P10 has been amended to clarify Council's support all forms of tertiary education opportunities including a university.</p> <p>A submission from the State Library identified the important role of libraries in education and providing space by students at all levels, and DPIE – Development and Transactions noted the former Manly Hospital site master plan will consider potential education opportunities.</p>
Change	Source
P10 text amended to clarify that future opportunities include all forms of tertiary education and new models for learning, such as satellite campuses, shared communal learning spaces, online learning; flexible teaching facilities and partnerships.	DPIE – Development and Transactions, Community
P10 text and principle amended to also include tertiary education opportunities (in addition to a university)	NSLHD, Community

Submission summary	Response summary
A10.1 amended to include reference to investigate partnerships. It was also expanded to reference tertiary education, in addition to a university when investigating opportunities in strategic centres. Department of Education listed as a partner (error fixed)	NSLHD, Community
<i>See also NSW Government Agency submissions and responses for changes made in response to the State Library and DPIE – Development and Transactions</i>	

P11 – Social infrastructure including community facilities, health, sport and recreation facilities and shared use (22)

Submission summary	Response summary
<p>Community facilities</p> <p>These submissions generally supported Council's priority and included calls for more facilities and suggestions for new facilities including at Dee Why and the Warriewood Valley Community Centre and a performing arts venue to support live music, arts and theatre.</p> <p>Many submissions raised the potential for improved shared use of facilities.</p> <p>Some organisations requested recognition of their venues in providing community roles and functions, including: cafes, religious organisations and some registered clubs.</p>	<p>P11 highlight's Council's priority to plan for community facilities and services that meet changing community needs. A11.1 seeks to complete a range of studies in order to achieve this priority, including a social infrastructure study, open space and recreation strategy, children's services strategy, community centres strategy and social plan. This has been amended to reference Council's library strategy.</p> <p>Location of services will be addressed via A11.2 which seeks prepare and implement a property strategy to optimise Council-owned property for long-term benefit, addressing findings of the social infrastructure study.</p> <p>Glen Street Theatre provides a performing arts space. A number of other performing arts spaces are identified on the new Map 15* which has been extracted from Council's Arts and Creativity Strategy.</p> <p>Some registered clubs offer a range of social, lifestyle and community functions that are available for use by the wider community and it is appropriate to acknowledge this role through in P11.</p> <p>Council's contribution plans include a number of infrastructure items, including Warriewood Valley Community Centre. The 'Implementation' section of <i>Towards 2040</i> identifies that implementation of the Section 7.11 plan for Warriewood Valley is required. Community facilities in Dee Why are dependent on future development as outlined in the Section 7.11 plan for Dee Why Town Centre.</p> <p>A number of changes have been made throughout <i>Towards 2040</i> with respect to community facilities, shared use, arts and creative opportunities and partnerships and in response to submissions from Create NSW, State Library and Office of Sport.</p>
<p>Health facilities</p> <p>Some submissions raised concerns with health infrastructure, including issues with the new Northern Beaches Hospital. It was suggested that Mona Vale Hospital should reinstate emergency services and not be closed.</p>	<p>The provision of health services is a NSW Government matter. The findings from the Parliamentary Inquiry into the Northern Beaches Hospital is a matter for Healthscope, who are the operators of Northern Beaches Hospital.</p>
<p>Shared Use</p> <p>Many submissions raised the opportunities to facilitate shared use of community facilities.</p>	<p>The social infrastructure study (A11.1) will make recommendations for innovative social infrastructure delivery models such as shared use/partnership arrangements with other government and non-government organisations (for example, churches and schools) to help address identify shortfalls in social infrastructure provision.</p>

Submission summary	Response summary
<p>Sport and recreation facilities</p> <p>These submissions called for more sport and recreation facilities including aquatic centres and pools to provide water safety education and mental and social benefits. There were calls for recreation to be 'free' and to overcome the perception that the area is dominated by sporting facilities.</p>	<p>A social infrastructure study and open space and recreation study will be completed by Council (A11.1) which will identify the community needs for recreation facilities, such as aquatic centres.</p> <p>Planning for open space for recreation is also addressed in P6. The LGA is fortunate to have a significant amount of publically accessible 'natural' open space and public open space which enables free recreation, unlike some formalised open space or facilities which may incur fees for ongoing use and maintenance. It is Council's intent to ensure that access to natural open space and waterways is sustainable to that these areas are preserved for the future (see P6).</p>
Change	Source
P11, Figure 43* updated to reference 15 children's services (rather than 9)	Community
P11, Figure 44* amended to include legend showing types of social infrastructure	Community
P11 text added to acknowledge the many organisations and businesses that offer a range of social, lifestyle and community functions to local residents including private or not-for-profit organisations such as cafes, sports clubs and other registered clubs	Community
A11.5 amended to add independent schools as a partner (to match Map 12*)	Council
<i>See also NSW Government Agency submissions and responses for changes made in response to Create NSW, State Library and Office of Sport</i>	

P12 – Community needs including seniors, youth and cemeteries (20)

Submission summary	Response summary
<p>Community</p> <p>These submissions highlighted the opportunity that <i>Towards 2040</i> provides to integrate international best practice and innovation and address suicide rates, loneliness, household stress and homelessness.</p> <p>The importance of providing healthier and safer spaces was mentioned along with multi-generational living and appropriate dwelling design as solutions toward population retention, health and growth. The importance of fresh food was mentioned with support for community gardens. The importance of shade was also brought up in a submission by the Cancer Council to minimise exposure to UV radiation.</p>	<p>P12 includes principles and actions to develop neighbourhoods that inspire social interaction and inclusion.</p> <p>Healthy and safe spaces are addressed in P12 which supports socially connected communities including a principle to encourage fresh food production in urban areas, such as community gardens. P11 supports planning for social infrastructure that supports community wellbeing.</p> <p>A12.8* outlines Council's commitment to investigate mechanisms to address homelessness. The social plan will review housing diversity and affordability at a high level in terms of impacts on community groups and their health and wellbeing (A12.3*).</p> <p>New text, amended actions and principles have been included in P5 to identify UV radiation as a natural hazard, acknowledge the high incidence of melanoma in the LGA, address UV radiation through tree canopy targets and to incorporate shade design requirements into planning controls and design guidelines (see also P5 green urban environments).</p> <p>Changes have also been made to reference the importance of healthy fresh food in shops in response to a submission from NSLHD, active communities in response to a submission from the Office of Sport and programs to improve literacy in response to a submission from the State Library.</p>
<p>Seniors</p> <p>The need to plan for an aging population was raised including the need to assist older residents to stay in their own homes, improve mental health and concerns with profit-driven aged care facilities. Innovative solutions were also supported such as incorporating preschools with nursing homes.</p>	<p><i>Towards 2040</i> includes references throughout about the ageing population and P12, Figure 45* identifies population growth by age, highlighting the importance of anticipated demographic changes in the LGA. The technical studies will further address likely demographic changes.</p> <p>The actions in P12 include promotion and monitoring of safety, social connection and community health. Also, A12.3* commits to social planning that, amongst other matters, addresses specific demographic cohorts, including youth, older people and people with disability.</p>

Submission summary	Response summary
	Nursing homes are generally provided under State government legislation. Changes to allow for multi-use within these facilities is a matter for consideration for the State government.
<p>Youth</p> <p>Submissions raised concerns with retaining young people, youth suicide and the need for activities for young people and teenagers at night (e.g. festivals and night life).</p>	<p>Council's Youth Development Team provides a range of programs, activities and events targeting young people 12 – 24 years of age. All Council youth events are drug and alcohol free, encouraging young people to go out, have fun and socialise with peers in a safe and supportive environment. Some examples of programs include the Northern Composure Band Competition, 24/7 Youth Film Festival and large scale events at the PCYC attended by up to 800 patrons.</p> <p>Within <i>Towards 2040</i>, P12 commits to an inclusive, healthy, safe and socially connected community, with an action to prepare specialised plans for the community including for young people. P30 also outlines Council's commitment to prepare a night-time economy strategy and facilitate diversified night-time activities that avoid the reliance on alcohol-focused businesses and help to address anti-social behaviour in places like Manly, Mona Vale and Newport.</p>
<p>Cemeteries</p> <p>One public submission mentioned that cemeteries (Mona Vale and Frenchs Forest) are expected to be at capacity by 2025-30. It was suggested that Council plan for provision of culturally appropriate cemetery services.</p>	<p>The <i>District Plan</i> (P3) identifies that cemeteries and crematoria are key social infrastructure that also need to be accessible geographically and economically, and reflective of a diversity of cultures and backgrounds. A growing Greater Sydney requires additional land for burials and cremations with associated facilities such as reception space and car parking. P12 has been amended to address planning for cemeteries and in response to the GSC Assurance process and a submission from Cemeteries and Crematoria NSW.</p>
Change	Source
P12 text added to reference cafes as an activity element for streets, places and neighbourhoods	Community
P12 text added to outline the need to plan for interment provision in the LGA. A glossary definition was added for interment	Community, Cemeteries and Crematoria NSW
P12 principle added to support the provision of local, sustainable, affordable, innovative and culturally appropriate interment services	Community, Cemeteries and Crematoria NSW
A12.3* updated to include reference to Council's children's services strategy	Community
A12.10* added to investigate mechanisms to address the shortfall in cemeteries, including innovative solutions, earmarking land for more cemetery space and options for Council to acquire further land to expand existing interment services. Cemeteries and Crematoria NSW was added as a partner.	GSC, Community, Cemeteries and Crematoria NSW
Glossary amended to add definition for 'Interment' that means the placement of human remains in the earth or in a mausoleum, crypt, vault, columbarium, niche wall or other structure designed for the placement of such remains. The term 'interment' applies to both cremated and uncremated remains	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to NSLHD, State Library and Cemeteries and Crematoria NSW</i>	

P13 – Aboriginal culture, heritage and communities (11)

Submission summary	Response summary
<p>Aboriginal culture and heritage</p> <p>Support was expressed for this priority and the preservation of indigenous culture and heritage, including the multiple items and sites. A request was</p>	<p>P13 aims to promote, preserve and protect Aboriginal and Torres Strait Islander heritage and culture in partnership with local Aboriginal and Torres Strait Islander communities. It is also addressed in P18 which is to protect, conserve and celebrate heritage.</p>

Submission summary	Response summary
<p>received for Council to proactively liaise and assist with the Aboriginal Support Group – Manly Warringah Pittwater. Suggestions to enhance connections included signage, festivals and cultural celebration and an Aboriginal Cultural Centre possibly at the former Manly Aquarium.</p>	<p>P13 supports stronger engagement and cooperation with Aboriginal communities, and outlines Council’s intent to work with local aboriginal communities on how best to facilitate a range of matters that involve Aboriginal cultural heritage.</p> <p>Council is currently preparing the Aboriginal Interpretive Signage Project. At the commencement of this project Council invited all registered Aboriginal stakeholders to participate.</p> <p>With respect to the Manly Aquarium, Council resolved on 26 November 2019 to adopt the Manly West Esplanade Heritage Activation Plan including - waiting on the determination on the Aquarium site prior to commencing the detailed feasibility work for the boardwalk/ harbour pool reinstatement concept. A26.1 includes preparation of the Manly West Esplanade heritage activation plan, including development of any new planning controls required to support the plan.</p>
<p>Crown Lands Transfer Program</p> <p>Queries surrounding the Crown Lands Transfer Program process and engagement. Concern with loss of land currently considered important for environmental protection.</p>	<p>Any Crown Land Transfers would be subject to the relevant tests and requirements of the relevant legislation. More detail on the program can be found online.</p>
<p>Working with MLALC</p> <p>A submission from MLALC stated that MLALCs goals cannot be achieved without feasible land use opportunities that allow the MLALC to manage its lands. Income generation without continual disposal of land is imperative to deliver statutory functions to improve, protect and foster best interests of the local Aboriginal community.</p> <p>MLALC objected to the inclusion of Belrose North in the MRA due to impacts on the feasibility of this land for future development.</p> <p>The submission outlined support of the inclusion of social housing scheme initiatives under A13.3 and requested clarification of how this action relates to Belrose North site. It was requested that Action 13.3 be broadened to include ‘establishing and maintaining a suitable asset base’. MLALC also requested inclusion as a partner for A13.1.</p>	<p>A13.3 within P13 outlines Council’s intent to work with the MLALC to implement initiatives in their community land and business plan including tourism strategies and aspirations for a cultural centre, homelessness strategies and social housing schemes and the identification and protection of places with high cultural values.</p> <p>The reference to social housing schemes does not specifically relate to potential housing at Belrose North. Council recognises that MLALC is a major landholder in the LGA that should be consulted on major proposals that would affect their land.</p> <p>Including a reference to feasible and appropriate land use opportunities in A13.3 is supported, as well as adding MLALC as a partner for A13.1. An action was added to P4 to reflect this work as it applies to the MRA.</p> <p>Note that P13 text was amended to reflect updated data on heritage items being four Aboriginal Places and 1,060 Recorded Aboriginal Sites in response to a submission from Heritage DPC.</p>
Change	Source
<p>P13 text box updated to clarify that Northern Beaches Council supports reconciliation with Aboriginal and Torres Strait Islander communities, not just with Councils of the North District, to better reflect A13.5 which includes the investigation of supporting a national treaty between Aboriginal and Torres Strait Islander people and all levels of government.</p>	<p>Council</p>
<p>A13.1 amended to add MLALC as a partner to the development of LEP and DCP controls that protect Aboriginal heritage and areas of cultural significance including the Government Architect NSW’s Ochre Grid (once finalised)</p>	<p>MLALC</p>
<p>A13.3 amended to reference feasible and appropriate land use opportunities when working with MLALC to implement initiatives in their community land and business plan</p>	<p>MLALC</p>
<p>A13.5 amended to clarify that Council will work in collaboration with Aboriginal and Torres Strait Islander people when investigating mechanisms to better connect with these communities. Partner clarified as North District councils.</p>	<p>Community</p>

Submission summary	Response summary
See also NSW Government Agency submissions and responses for changes made in response to Heritage DPC and GSC.	

P14 – Arts and creativity (4)

Submission summary	Response summary
<p>One submission suggested that support for art and cultural life is insufficient and requested Council acknowledge the strong representation of the arts and cultural community among individuals and businesses and their contribution to the local economy, including job creation and retention.</p> <p>The remaining submissions made suggestions for arts and creative opportunities including: recognising science as a creative industry, hosting an annual art / solar / wind at Long Reef headlands, a new gallery at Avalon Golf Clubhouse, and integrating art and sculpture with infrastructure.</p>	<p>P14 articulates Council's recognition of individuals and the local business community and their contribution to local economy and jobs creation. This is supported by the principles and actions in P14. It is also recognised in P11 (community facilities), P12 (socially connected communities), P22 (jobs and skills), P24 (Brookvale), P29 (tourism), P30 (night-time economy).</p> <p>P14 includes implementation of the Northern Beaches Arts and Creativity Strategy: Connected Through Creativity 2029 adopted by Council on 22 October 2019. This Strategy incorporates more detailed initiatives and actions to support arts and creativity.</p> <p>Council's resolution of 26 February 2019 was that Council support the refurbishment of the Avalon Golf Club House lower ground floor, within the existing footprint, to include artist's studios and teaching space. Council has not at this point in time resolved to use the Avalon Golf Club House as a gallery.</p> <p>The suggestion to integrate art and sculpture into new infrastructure is supported, a new principle has been added to P9 to this effect.</p> <p>Note P14 has been significantly updated to better reflect the recently adopted Northern Beaches Arts and Creativity Strategy: Connected Through Creativity 2029.</p> <p>A number of changes have also been made throughout <i>Towards 2040</i> to address arts and creative opportunities in response to a submission from Create NSW. Arts and cultural activity and education have also been identified as shared use opportunities in response to a submission from the State Library.</p>

Change	Source
P14 title amended from 'An artistic, creative and innovative culture' to 'A community enriched through the arts and connected through creativity'	Council
P14 text updated to acknowledge the role of arts and creativity skillsets for their importance in supporting problem solving and creative solutions and the updated acronym STEAM (Science, Technology, Engineering, Arts and Mathematics)	Community
P9 principle added to incorporate public art projects into infrastructure upgrades	Create NSW, Community
P27 text and A27.2 amended to clarify Council's intent to deliver a contemporary arts and creativity centre in Mona Vale (to reflect terminology in Arts and Creativity Strategy)	Community
See also NSW Government Agency submissions and responses for changes made in response to Create NSW and State Library	
See also summary of proposed amendments for changes made to P14 to reflect the Northern Beaches Arts and Creativity Strategy: Connected Through Creativity 2029	

Housing supply including housing projections and proposed locations for housing growth (30)

Submission summary	Response summary
<p>Housing targets</p> <p>Community submissions questioned the proposed housing targets and statistics in <i>Towards 2040</i>, and the need to accommodate increased numbers.</p> <p>It was suggested that the increase of granny flats (also known as secondary dwellings) may address housing delivery and affordability issues, and noted these dwellings are not reflected in ABS statistics.</p> <p>Also counted in this number of submissions were requests from property owners for site specific zoning uplift (see P9 response).</p>	<p>P15 identifies that there is capacity for around 6,400 new dwellings to be developed in areas already zoned for growth and 4,360 dwellings in Frenchs Forest Planned Precinct. It is projected that there will be demand for 11,747 dwellings by 2036, resulting in a gap of 962 dwellings (Figure 48*). These figures have been adjusted to align with work progressed on the housing strategy.</p> <p>Five year housing targets are established the NSW Government in the <i>District Plan</i>. Medium and long-term housing projected demand in <i>Towards 2040</i> are based on population projections and informed by detailed analysis at the LGA level, which is included in the housing issues and opportunities paper. Medium and long term housing targets for the LGA will be established through the local housing strategy (A15.1) which require endorsement from the NSW Government to ensure the LGA contributes to the North District target.</p> <p>Feedback from the GSC Assurance process outlined a misalignment between the <i>Towards 2040</i> housing numbers to 2036 and the numbers released by the GSC, producing a discrepancy of 6,235. A significant factor contributing to this discrepancy relates to assumptions made regarding future household size. This matter is being reviewed with DPIE. Concern was expressed that future housing supply does not contribute enough to the 92,000 North District implied dwelling target. <i>Towards 2040</i> has been updated to reflect this discrepancy and Council's intention for the local housing strategy (A15.1) to investigate and include a more detailed analysis of housing capacity, including take up and future housing opportunities to inform changes to the LEP.</p> <p>The NSW Government is aware that its methodologies for tracking housing numbers currently does not capture granny flats / secondary dwellings. Council has been advised that the NSW Government is reviewing this issue with a view to improving its housing data.</p> <p>A number of amendments have been made to P15 in response to feedback from the GSC Assurance process, including data on granny flats, seniors living units and boarding house rooms built since 2016, clarification that the 'demand' figure is an implied dwelling target, clarification that the local housing strategy will consider feasibility and clarification that that the existing capacity under current planning controls (for 6,400 new dwellings) is 'feasible' capacity which is further broken down by location in Map 17* and by type in Figure 50*.</p>
<p>Location of new housing</p> <p>Support was expressed for locating much of the new housing in Frenchs Forest and for infill development in existing urban areas, including high density living in strategic and local centres, outside of employment lands, along the coast and transport corridors, without creating 'ghettos' consisting of the same development types. These submissions were unsupportive of clearing bushland for housing, including at Frenchs Forest and Ingleside, and highlighted the need to avoid natural hazard risks.</p>	<p><i>Towards 2040</i> sets out strategic directions to help guide decisions about where housing should be located. P15 includes principles that are specific to the location and form of new housing and address matters such as access and proximity to existing public transport, other infrastructure, and services, the effect of natural hazards or risks (e.g. flooding or bush fire), the existing character of areas, and the social or demographic mix across the community.</p> <p>P15 includes a housing principle to use existing urban land more efficiently to protect the natural environment. The term 'urban land' refers to areas that exclude the MRA and future MRA investigation area including the suburbs of Terry Hills, Duffys Forest, Belrose North and Oxford Falls Valley. Housing options in the MRA will have regard to a range of factors consistent with the principles contained in <i>Towards 2040</i>, Council's local housing strategy, and guidance provided by DPIE. The extent of further studies required to finalise</p>

Submission summary	Response summary
<p>There was also some support for housing in non-urban areas like the MRA, particularly from land owners, with one suggestion that this area could accommodate small-scale eco communities, rural land-share or co-housing developments.</p>	<p>new zonings under the Northern Beaches LEP is currently being determined.</p> <p>New development (which includes infrastructure) will be required to meet the strategic directions of <i>Towards 2040</i>, which include a number of priorities aimed at protecting the environment. When considering hazards such as flooding and bush fire, there are other legislative layers such as Ministerial Directions and the PBP guidelines that require us to look at development holistically.</p>
<p>SEPP exemptions</p> <p>Support for Council's intent to seek exemptions to State Environmental Planning Policies (SEPPs) for boarding houses, seniors housing and medium density housing (SEPP exemptions) as outlined in A15.3 and also with respect to the MRA outlined in A4.4. It was also noted that boarding houses and secondary dwelling developments should be restricted as outlined in A16.5.</p> <p>There were also strong objections to these actions with concerns this would adversely impact on housing affordability and diversity.</p>	<p>Council's local housing strategy will need to demonstrate how the needs of the community would be met with respect to boarding houses, seniors housing and medium density housing to justify any exemptions to certain SEPPs.</p> <p>The local housing strategy (A15.1) will be subject to a separate process of community engagement to afford the community the opportunity to have a say as part of this process.</p> <p>In response to feedback from the GSC Assurance process, actions 2.2, 4.4, 15.3, 16.5, 28.2 were amended to clarify that Council will work with DPIE on the application of SEPPs by developing appropriate approaches based on evidence in the local housing strategy.</p>
Change	Source
<p>A4.4 amended to clarify State policies include those for boarding houses and medium density housing as well as seniors housing to align with A15.3</p>	<p>Community</p>
<p>P15 text and Figure 48* amended to change the additional housing demand from 11,200 to 11,747 (resulting in a gap of 962 replacing 480). Text also amended to clarify that this equates to 652 dwellings/year (not 620 dwellings/year)</p>	<p>Council</p>
<p><i>See also NSW Government Agency submissions and responses for changes made in response to GSC</i></p>	

Housing diversity including boarding houses and medium density (24)

Submission summary	Response summary
<p>Most submissions supported increased housing diversity. These submissions highlighted the need for universal housing, intergenerational housing, seniors housing and housing for families.</p> <p>There was some support for boarding houses and low rise medium density development such as townhouses in the right locations. Many submissions objected to further high rise development and apartment buildings.</p> <p>Submissions also raised matters relating to housing design, including the need to integrate with local character, provide communal spaces for social interaction, private open space and parking even in places well serviced by public transport.</p> <p>A question was also raised as to the relevance of removing the Floor Space</p>	<p>Demand for diverse housing, including medium density, is discussed in the <i>District Plan</i> as well as the housing issues and opportunities paper. Demand is associated with the spectrum of household types that is present within the Northern Beaches.</p> <p>P15 includes a principle to provide greater housing diversity and this will be addressed in the local housing strategy (A15.1). The local housing strategy will inform the types and mix of housing required across the LGA and identify suitable locations. This strategy will inform LEP and DCP controls to ensure the supply and mix of housing represents community needs including apartment mix controls; low-rise medium density housing; adequate communal spaces in higher density development; requirements for adaptable housing and universal design (A15.2). Consideration of housing types in the local housing strategy will address design controls such as site coverage, open space and parking requirements. Communal spaces in residential flat buildings, including rooftops, will be addressed in new LEP and DCP controls as outlined in A12.4*, and supplement the NSW Government Apartment Design Guide requirements for communal open space.</p> <p>The need for housing to integrate with local character is addressed in P17 and A17.1 which identify the need for a local character study and local character planning controls for key areas. Place plans will</p>

Submission summary	Response summary
Ratio (FSR) control in Manly as outlined in A15.2.	respond to the recommendations of the local housing strategy using a place-based approach to planning for local character (see A17.2). With respect to the Manly FSR controls, previous reviews of planning controls have identified the need to remove this control and develop new planning controls as part of the new LEP and DCP.
Change	Source
P15 text amended to change the term 'Medium Density Housing Code' to 'Low Rise Medium Density Housing Code' for clarification, and update the date for the commencement of this code from the 31 October 2019 to the 1 July 2020. Reference to Council's request for an extension to the deferral of this code has been updated to explain that Council is considering alternatives to the Code in the preparation of its local housing strategy, including greater opportunities for small lot housing and dual occupancy housing close to existing centres.	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to GSC</i>	

Ingleside future and planning (10)

Submission summary	Response summary
<p>Submissions raised the issue that the future of Ingleside is unclear and requires clarification including whether the proposed housing targets are considered.</p> <p>Submissions in support of Ingleside recommended Council pursue the expedited delivery of the Ingleside Growth Area and that development from the centres could be allocated towards Ingleside.</p> <p>Submissions objecting to the Ingleside Growth Area raised concerns with natural hazards and environmental impacts.</p>	<p>This is addressed in A8.7 and A15.6 which seek to resolve the future of Ingleside to ensure any development is sustainable and resilient to natural hazard.</p> <p>The draft Precinct Plan was officially withdrawn by DPIE, the lead for this project, due to identified and unacceptable bush fire risks. DPIE is currently undertaking bush fire evacuation modelling to determine whether any further development could safely exist in the area (A15.6). The future zoning of Ingleside will depend upon the outcomes of a strategic bush fire assessment and other studies being undertaken by DPIE (A8.7).</p> <p>P4 outlines that Ingleside may be included in the MRA depending on the outcomes of bush fire investigations.</p> <p>Note that P4, Figure 30* has been amended to show Ingleside in the illustrated map for the MRA, for illustrative purposes only.</p>
Change	Source
No changes in response to submissions	

P16 – Affordable and social housing provision, boarding houses and rental conditions (28)

Affordable housing / social housing (28)

Submission summary	Response summary
<p>General feedback</p> <p>Some submissions were unsupportive of Council addressing the need for increased affordable and social housing suggesting that this area will never be affordable due to the coastal location and that this was outside the area of Council's responsibility.</p> <p>Many submissions were supportive of addressing the deficit of social and affordable housing but raised concerns that the proposed 10% target was not high enough and there was limited</p>	<p>Providing more diverse and affordable rental and social housing options will help low to moderate income households including families and key workers, such as police and health care workers, stay in the area. It will mean people of all incomes and backgrounds can participate in the community. Councils have powers to address affordable housing issues through the <i>Local Government Act 1993</i>; the <i>Region Plan</i>; the <i>District Plan</i>; the <i>Environmental Planning and Assessment Act 1979</i> and <i>State Environmental Planning Policy No.70</i>.</p> <p>A16.1 looks to increase the supply of affordable rental housing through the local housing strategy and LEP and DCP controls, A16.4 looks to investigate opportunities for joint projects to deliver social and affordable rental housing with local community housing providers and</p>

Submission summary	Response summary
<p>opportunities within the LGA to provide any significant housing uplift which would trigger this requirement.</p>	<p>A16.6 involves establishing a memorandum of understanding with the NSW Government to improve social housing provision in the LGA.</p> <p>Council has prepared a draft affordable housing contributions scheme for the Northern beaches LGA in accordance with Council's endorsed Affordable Housing Policy and Action Plan. The objectives of the Scheme are to provide local residents and key workers on low to moderate incomes with access to affordable rental accommodation to assist them to enter the private rental market or home ownership. The Scheme will apply initially to the Frenchs Forest Planned Precinct (A16.3), however may be extended to other areas that are rezoned as part of the local housing strategy or are subject to increases in residential density in the future. Contribution rates will be required to be developed and tested to ensure that the rate is viable and will not impact on development feasibility.</p>
<p>Rental conditions</p> <p>The need to investigate fair lease conditions for renters was raised, advocating support for reform to the <i>Residential Tenancies Act</i>. Concerns were raised of increasing rental rates and conditions in rental agreements that favour landlords over renters and associated impacts on mental health, suicide, financial stress and homelessness.</p>	<p>The <i>Residential Tenancies Act 2010</i> and <i>Residential Tenancies Regulation 2010</i> outline rights and obligations to landlords and tenants. Concerns with NSW legislation should be directed to NSW Government.</p> <p>The local housing strategy and social plan will review housing diversity and affordability at a high level in terms of impacts on community groups and their health and wellbeing (A12.4). Mechanisms to address homelessness will be investigated (A12.9).</p>
<p>Boarding houses</p> <p>Some submissions raised objections to boarding houses while others supported these housing types in the right locations.</p> <p>Several land owners and providers of affordable housing raised concerns with the proposed SEPP exemptions on boarding houses (A16.5) and the potential impact on housing delivery.</p> <p>Shelter NSW suggested that Council advocate for the NSW Government to amend the Affordable Rental Housing SEPP to ensure affordability, specifically, requiring dwellings delivered under the SEPP to be affordable to low and very low income earners.</p>	<p>Council's local housing strategy would need to demonstrate how the needs of the community would be met with respect to boarding houses, seniors housing and medium density housing to justify any exemptions to certain SEPPs.</p> <p>In response to feedback from the GSC Assurance process, actions 2.2, 4.4, 15.3, 16.5, 28.2 were amended to clarify that Council will work with DPIE on the application of SEPPs by developing appropriate approaches based on evidence in the local housing strategy.</p>
<p>Change</p>	<p>Source</p>
<p>No changes in response to these submissions.</p>	
<p><i>See also NSW Government Agency submissions and responses for changes made in response to GSC</i></p>	

Affordable / social housing provider feedback (5)

Submission summary	Response summary
<p>Submissions were received from several providers of affordable housing, including Bridge Housing, the Community Housing Industry Association, Landcom, the Salvation Army and Shelter NSW.</p>	<p>A16.1 seeks to increase the supply of affordable housing through Council's local housing strategy and LEP/DCP controls. A16.2 seeks to implement Council's Affordable Housing Policy and Action Plan which currently addresses a number of these recommendations including collaboration with community housing providers and working with others (including other local councils and State Government) to deliver affordable rental housing.</p>

Submission summary	Response summary
<p>Providers offered assistance to Council in identifying affordable housing opportunities and mechanisms to deliver the proposed affordable housing targets, offering a number of solutions.</p> <p>It was suggested that Council specify the proportion of lower-income renters living the Northern Beaches, the percentage that experience housing stress and the levels of that housing stress.</p>	<p>A demand analysis for affordable housing has been included within the housing issues and opportunities paper, which will be further explored within the local housing strategy (A15.1). Council will continue to work with DPIE and DCJ to implement housing feasibility tools which will assist in identifying opportunities where higher rates of affordable housing may be achieved.</p> <p>Council's local housing strategy (A15.1) will investigate other opportunities to deliver affordable housing, potentially including consultation with not for profit and private sector, application of special rate levies, and implementation of planning mechanism to encourage affordable housing developments.</p> <p>P16 was amended to include further detail on the number of low income households on the Northern Beaches. Note that A16.5 was amended to clarify that Council will work with DPIE on the application of SEPPs by developing appropriate approaches based on evidence in the local housing strategy and align with actions 2.2, 4.4, 15.3, 28.2.</p>

Change	Source
P16 text added to clarify definition of low income households (falling into approximately the bottom 20% of equivalised incomes across Australia or under \$500 per week in 2016) and identify the number of residents that fell into this category in 2016	Community
P16 text amended to clarify that more diverse and affordable rental and social housing options will help very low to moderate income households as well as key workers.	Community
A16.5 amended to ensure social and affordable housing caters for very low to moderate income earners	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to GSC</i>	

P17 – Local character, design excellence and the public domain (22)

Submission summary	Response summary
<p>Concerns that population growth and future development will adversely impact on the existing lifestyle and quality of life and relaxed, coastal and family friendly character of the area.</p> <p>Specific mention was raised of retaining the character of villages and places, including Avalon Village, Ingleside, Mona Vale, Narrabeen and Newport. There were also calls to clarify the future of residential areas outside of targeted growth areas.</p> <p>Suggestions to protect local character included the use of local character statements, including those that align with the current Pittwater DCP. Other suggestions included addressing design excellence, biophilic design, exemptions from State policies and retaining the suburban character and stand-alone houses and avoiding developments such as Dee Why style unit blocks. The importance of Aboriginal and European culture and heritage was also raised with respect to local character</p>	<p>Local character is addressed in the <i>Towards 2040</i> vision along with a number of priorities that are aimed at enhancing lifestyle and quality of life, such as P19 public transport; P11 community facilities and services and P17 local character.</p> <p>A local character study is being prepared (A17.1) as part of the process of preparing Council's new LEP and DCP to accommodate growth where appropriate, whilst ensuring that local character is maintained or enhanced. This study will include an investigation of key scenic and cultural landscapes and be guided by the DPIE's guidelines. The results of this work will be used to inform local character content in either or both of the LEP and DCP. This may trigger local variations or, in exceptional circumstances, local exclusions from State policies.</p> <p>Implementation of place-based approaches to planning will ensure future development is keeping with the vision for the locality, whilst addressing the overall LGA vision set out in <i>Towards 2040</i>. A17.2 will implement place planning that applies a place based approach to planning for local character.</p> <p>P17 acknowledges the communities role in informing decision making and place-based approaches to planning.</p> <p>Heritage and culture and design excellence are also important considerations for local character in P17 (refer to Figure 55*). Design excellence will be addressed through controls in the new LEP and</p>

Submission summary	Response summary
<p>along with consultation with the community.</p> <p>Submissions from private developers noted that local character should not be mutually exclusive of new development and that growth can be accommodated in ways that maintain and respect local character and addressed in Council's DCP.</p>	<p>DCP (A17.1) and through the establishment of a design excellence review panel (A17.4). A principle has been added to acknowledge the importance of design excellence and of heritage and culture in local character and place.</p>
Change	Source
P17 principle added to acknowledge the importance of heritage and culture in local character and place	Heritage DPC, Community
P17 principle amended to reference design excellence when renewing great places to align with the intent to prepare LEP and DCP controls that incorporate design excellence (A17.1) and establish a design excellence review panel (A17.4).	Council
A17.1 amended to update reference to Council's public domain guidelines as an 'urban design framework and guidelines for public spaces'.	Community
A17.1 amended to clarify that Council will review built form and landscape controls to ensure good design as part of the new LEP and DCP	Community
A22.1 amended to clarify that Council will improve the amenity, built form and design of centres and non-residential buildings	Community

P18 – Aboriginal and European heritage (7)

Submission summary	Response summary
<p>Submissions raised the importance of protecting heritage, including Aboriginal sites and historic and modern heritage buildings. Suggestions were made for a curated local history study for schools, expanding the Manly Art Gallery as a local history museum and enabling adaptive reuse of heritage items in Council's controls.</p> <p>Queries were made on the progress of the thematic history study and heritage register with the suggestion that communities should be encouraged to suggest items.</p> <p>One submission suggested heritage is minor in value and should not drive strategy.</p>	<p>P18 identifies the importance of protecting, conserving and celebrating heritage, including the LGA's history and identity and reflects community sentiment outlined in <i>Shape 2028</i>. It includes principles and a number of actions to address identified gaps between the three planning frameworks and to address the <i>District Plan</i>. Principles in P18 will guide planning for new development.</p> <p>A18.1 includes preparation of heritage studies to strengthen planning for heritage in the LGA. A18.2 includes development of new LEP and DCP controls that protect, conserve and celebrate heritage. When the draft Northern Beaches LEP is placed on public exhibition, the community engagement program will afford opportunities for community members to make submissions about any aspect of the draft LEP, including heritage items, potential items and matters around heritage management.</p> <p>A18.3 and A18.4 outline Council's intention to educate the community and investigate how we can improve heritage through mechanisms such as heritage advisory service, significant tree register and memorials and monuments register; conservation management plans for Council-owned heritage items; securing grants to upgrade Council-owned heritage items; and a heritage award program.</p> <p>Note that changes have been made to P18 to reflect updated data on State Heritage items from 15 to 16 and A18.3 in response to a submission from Heritage DPC.</p>
Change	Source
See also NSW Government Agency submissions and responses for changes made in response to Heritage DPC	

Productivity – written public submission issues and responses

Note: The numbered actions, figures and maps marked with an asterisk reference the version of *Towards 2040* as presented to the Council meeting 25 February 2020.

P19 – Regional transport including the Beaches Link Tunnel, B-Line and BRT and mass transit (58)

Beaches Link Tunnel proposal including public transport (18)

Submission summary	Response summary
<p>Those who objected to the Beaches Link Tunnel raised concerns with the expense and impacts including on character, loss of public open space (Balgowlah Golf Club) and location of unfiltered exhaust stacks close to schools, child care and aged care facilities and the location of the tunnel entrance (opposite Balgowlah Boys High School). Impacts on the environment were also raised including the road widening on Wakehurst Parkway and proposed threat to wildlife.</p> <p>There were concerns that the Tunnel would increase car dependency and local congestion as it was intended primarily for cars and trucks.</p> <p>Those who supported the proposal were generally of the view that it be used for public transport including electric buses, trackless trams or light rail, suggesting the tunnel should only support no emission transportation to avoid potential impacts of exhaust stacks.</p>	<p>P19 outlines initiatives to improve public transport including the Beaches Link Tunnel, subject to public transport, aligning with Council's endorsed position from our Transport Strategy, <i>Move</i>. A19.7 identifies the importance of public transport as part of the Beaches Link Tunnel and TfNSW are identified as a partner for this action.</p> <p>TfNSW 's submission to the draft <i>Towards 2040</i> clarified the NSW Government has not confirmed or committed to the type of public transport services to be provided in the Beaches Link Tunnel. They suggested Council make a number of changes to <i>Towards 2040</i> including updating the extent of the tunnel investigation area and clarifying that future stages of development at Frenchs Forest are dependent on longer term transport options such as the Beaches Link Tunnel and BRT from Brookvale Dee Why to Chatswood.</p>
Change	Source
<p>A19.10 amended to seek consideration of Beaches Link Tunnel as part of the metropolitan city-serving network</p>	<p>Community</p>
<p><i>See also NSW Government Agency submissions and responses for changes made in response to TfNSW and GSC</i></p>	

B-Line extension to Newport, east-west links and transition to BRT (30)

Submission summary	Response summary
<p>B-Line extension to Newport</p> <p>Some submissions objected to the proposed extension of the B-Line to Newport, citing concerns with impacts on local character, parking, businesses, congestion and an assumption this would result in increased development in Newport and further north. It was suggested that Council resolved not to extend the B-Line due to concerns re increased development. Some of these submissions called for enhanced express services to and from Palm Beach instead (e.g. E88) along with the expansion of Keoride.</p> <p>There was also support for the B-Line extension to Newport suggesting the anti B-Line stance was not reflective of the whole Newport community's wishes. It was outlined that many people living in Newport and Avalon drive to Mona Vale in more than one car to get to work and that the existing Keoride service does not work for busy commuters.</p>	<p>The proposed extension of the B-Line to Newport is consistent with Council's Transport Strategy – <i>MOVE</i>. The Structure Plan has been amended to be consistent with Map 19 and A19.5 which identify the B-Line extension to Newport.</p>
<p>B-Line and BRT Transition</p> <p>Support was expressed for the proposed BRT between Manly and Brookvale, Dee Why to Chatswood along Warringah Road and from Mona Vale to Macquarie Pak along Mona Vale Road. These submissions generally also supported the proposed transition of these routes to BRT and required infrastructure upgrades including 24 hour clearways/bus lanes.</p> <p>Issues were raised with the existing B-Line infrastructure stating the car parks are too small and above ground rather than underground with units above, explaining land use could be more efficient. It was suggested that Council buy land to build car parks.</p> <p>Some submissions raised concerns about the feasibility of BRT, however, particularly between Newport and the city, mainly due to impacts on parking and businesses along these corridors.</p>	<p>P19 includes actions for Council to advocate for BRT along the B-Line and east-west links along with an action to investigate public transport corridors and future routes, aligning with Council's <i>Move</i> Transport Strategy 2038. The wording of the action has been clarified to reference mass transit as intended which includes trackless trams and rail.</p> <p>P19 identifies regional public transport priorities based on a vision for four fast and efficient public transport corridors for the Northern Beaches (which is included in the <i>Towards 2040</i> vision and structure plan). Whilst initially these corridors will support improved bus services such as the B-Line, Council intends for these corridors to transition to BRT requiring dedicated transport lanes.</p> <p>Future investigations for BRT will consider impacts, including impacts on parking. A20.1 supports implementation of <i>MOVE</i> Transport Strategy and action plans that support shared transport, active travel and public transport which will improve access to the regional public transport network, rather than increase parking.</p> <p>The nature of future BRT corridors will be subject to future planning and collaboration with NSW Government.</p> <p>In response to feedback from GSC and TfNSW, a number of changes have been made to <i>Towards 2040</i> to better align with <i>Future Transport 2056</i> and note whether transport projects were TfNSW <i>Future Transport 2056</i> initiatives or initiatives that Council will advocate for.</p>
Change	Source
<p>Structure Plan (Map 1) amended to be consistent with P19, Map 22* and A19.5 which identify the B-Line extension to Newport</p>	<p>Community</p>
<p><i>See also NSW Government Agency submissions and responses for changes made in response to TfNSW and GSC</i></p>	

Mass transit including light and heavy rail, trackless trams (23)

Submission summary	Response summary
<p>Support for mass transit (train, light rail, heavy rail or trackless tram) to reduce reliance on the car and support a walkable urban lifestyle. It was suggested the GSC's vision for a 30-minute city would not be feasible without mass transit, supported by commuter and bike parking, and reservations of land.</p> <p>Some commented that the four corridor vision in <i>Towards 2040</i> seemed to place emphasis on roads and serve cars, which is not sustainable, and the need to transition into a rail network in the long term.</p> <p>Suggestions included rail to Terrey Hills and between Chatswood and Dee Why with interchanges at Frenchs Forest and Dee Why connecting the north, south and west. Support was also expressed to plan for future train corridors in centres such as Frenchs Forest.</p> <p>Many submissions raised the need for mass transit to be implemented before any additional housing growth is considered in order to address existing traffic congestion.</p>	<p><i>Towards 2040</i> brings together transport and land use planning to ensure new development is located in areas with good public transport access. A number of priorities and actions work towards reducing reliance on the car, including P19 which identifies regional public transport improvements and P20 which supports active travel.</p> <p>Transport priorities outline initiatives to continue improvements to public transport, including investigation of mass transit. A19.9 identifies the need to investigate and protect future routes and interchanges. This action has been amended to clarify its intent, which includes investigation of mass transit.</p> <p>Transport planning for Frenchs Forest is addressed in P23 and A23.7 which identify transport improvements to Frenchs Forest. Planning for Frenchs Forest town centre has regard to transport projects in <i>Towards 2040</i>, including public transport to Chatswood and the Beaches Link Tunnel. The priority includes principles to guide planning for the area, including integration with the area's bushland, connecting to the broader active travel and public transport network and prioritising walking in the town centre.</p> <p>In response to feedback from GSC and TfNSW, a number of changes have been made to <i>Towards 2040</i> to better align with <i>Future Transport 2056</i> and note whether transport projects were TfNSW <i>Future Transport 2056</i> initiatives or initiatives that Council will advocate for.</p>
Change	Source
A19.9 amended to clarify Council's investigations into future transport routes includes mass transit	Community
<i>See also NSW Government Agency submissions and responses for changes made in response to TfNSW and GSC</i>	

P20 – Connectivity through public transport, active travel and technology (68)

Public transport improvements including electric buses and local services (52)

Submission summary	Response summary
<p>Submissions were generally supportive of improved public transport and the need for more frequent bus services and smaller buses on less popular routes. There was opposition to the privatisation of buses and calls for Council to advocate on this matter. Support was expressed for improved ferry services and sustainable transport including electric buses.</p> <p>Submissions raised the need for local bus connections to extend the reach of the regional transport network and provide services to local centres and improve public transport in the LGA. Suggestions included more efficient</p>	<p><i>Towards 2040</i> supports transit-orientated development. Limited public transport results in unsustainable dependence on cars. The provision of improved public transport will result in many benefits including reduced impacts on the environment, improved liveability and better access to jobs and services.</p> <p>P19 outlines initiatives to improve public transport on regional transport corridors whilst P20 focuses on improving local transport networks. A20.1 includes preparation of a public transport plan which will look at the overall local public transport network. Other services, such as local bus services and on-demand services may also provide future transport opportunities to enhance connectivity.</p> <p>The time frames for delivery of public transport actions is largely dependent on NSW Government and will be addressed in the LGA-wide land use infrastructure implementation plan (A9.1).</p>

Submission summary	Response summary
<p>connections to Balgowlah, Curl Curl, Allambie and the northern peninsula area; the Northern Beaches Hospital via Wakehurst Parkway; improved services by Forest Coach lines (e.g. Davidson, Belrose, Terrey Hills) and a local hop-on, hop-off bus between Newport and Palm Beach in peak tourist times.</p> <p>One submission noted the large proportion of people working from home in the former Pittwater area suggesting this negated the need to improve transport to these areas.</p>	<p>For Frenchs Forest, the Structure Plan identifies a number of public transport connections (existing and proposed) to Northern Beaches Hospital. Although Wakehurst Parkway is not identified as a key transport project in <i>Towards 2040</i>, opportunities for improved connections across the LGA will be considered in Council's public transport plan (A19.1).</p> <p>P9 already identifies wharf and ferry services as a key transport collaboration project. Amendments have been made to highlight the significance of the blue corridor and investigations for improved ferry connections to Manly.</p>
Change	Source
P19, Map 22* amended to clarify the Manly-CBD ferry is our blue highway, as per the Structure Plan	Community
A19.8 amended to clarify the investigation of new ferry connections to places such as Clontarf will also include investigations into improved ferry services to Manly	Community
P20 principle amended to clarify the intent of supporting smart technology, such as trials of new systems, is to assist people to move around more efficiently	Community
P26, Figure 72* amended to identify Manly wharf area as a transport interchange as a key element of the centre	Community

Active travel including cycling and walking infrastructure (22)

Submission summary	Response summary
<p>Submissions supported improved walking and cycling infrastructure. It was noted the small percentage of walking/cycling in journey to work (5%) was reflective of existing poor infrastructure which is car centric as opposed to places in Europe. The benefits of active travel were noted including health benefits, reduced carbon emissions and car dependence, safety and community wellbeing and cohesiveness.</p> <p>For cycling, there was support for separated cycle access on roads, bike parking and storage at hubs. Suggested infrastructure included a shared foot path linking North Avalon and Palm beach along Barrenjoey Rd and dedicated cycle ways from Mona Vale to Church Point to Terrey Hills, Roseville Bridge and Spit Bridge. It was also suggested that footpaths accommodate cyclists where sections of road are dangerous.</p> <p>For walking, improved footpaths were suggested along with streetlights for safer road environments.</p>	<p>Council has an ongoing capital works program for improvements to footpaths and bike paths with \$3 million per year dedicated to footpaths. Funding is allocated annually and improvement works are prioritised across the LGA according to local condition and safety and community needs. RMS and TfNSW also contribute to funding for active travel, with \$20 million invested in active travel improvements as part of the B-Line project.</p> <p>In <i>Towards 2040</i>, P20 outlines Council's overall vision for improvements to walking and cycling connections. It includes principles to prioritise safe cycling routes separated from vehicle traffic, and to prioritise walking infrastructure within proximity to strategic and local centres.</p> <p>A20.1 is to implement Council's Walking Plan, prepare and implement a bike plan, and pedestrian access mobility plans. The bike plan will include further detail on planned cycleway upgrades and initiatives such as end of trip facilities and bike parking. The walking plan identifies opportunities for footpath upgrades. These plans focus on enhancing walking and cycling to other modes of transport, in addition to being the primary mode of transport.</p> <p>A20.4 outlines Council's intent to investigate 'safe cycling routes separated from traffic' and A20.5 will ensure that place plans encourage active travel, and public domain improvements such as bike parking.</p> <p>The importance of active travel infrastructure is also highlighted in housing principles to ensure new housing is located close to public transport to reduce car dependence (P15). For Frenchs Forest, P23 includes a principle to improve public transport connections and cycle routes to Chatswood and Spit Bridge.</p> <p>Changes have been made with respect to active travel opportunities and Greater Sydney Principal Bicycle Network in response to submissions from TfNSW, GSC and NSLHD.</p>

Submission summary	Response summary
Change	Source
See also NSW Government Agency submissions and responses for changes made in response to TfNSW, GSC and NSLHD	

Transport technology including autonomous vehicles, electric cars and the sharing economy (9)

Submission summary	Response summary
<p>These submissions were supportive of transport technology including electric buses, e-bikes, scooters and electric cars. It was suggested that Council should lead the way in this area despite community sentiment and advocate for initiatives such as small electric buses that run between outer suburbs of the LGA.</p> <p>It was noted that autonomous cars will create a different footprint and demand in the future.</p> <p>Support was also expressed for more shared on-demand services including Keoride in the north and Uber Pool Ferry in Manly. Although Keoride was generally supported, it was noted by some that this service didn't sufficiently cater for commuters.</p>	<p>Council will continue to review and adapt to technology advancements through regular review of <i>Towards 2040</i> and <i>MOVE</i> Transport Strategy. For example, A21.2 identifies the need to prepare planning controls that consider clearance heights in car parks (adaptability), car share and electric vehicles.</p> <p>P20 supports a sustainable local transport network, including trials of new systems, such as Keoride, and smart technology to move around more efficiently. On-demand transport trials are also identified in P9, Map 12* which shows collaboration projects.</p> <p>A20.1 includes implementation of Council's Shared Transport Policy along with <i>MOVE</i> which includes 'integration of on-demand and shared mobility services into the wider public transport network' and 'supporting the expansion of the public transport network, including its integration with commuter parking and active travel networks.'</p>
Change	Source
P20 principle amended to clarify the intent of supporting smart technology, such as trials of new systems, is to assist people to move around more efficiently	Community
Glossary amended to add definition for 'Smart city' as a concept for a city that incorporates information and communication technologies (ICT) to enhance services such as energy, transport and utilities and improve sustainability	Community

P21 – Road space, friendly streets, freight and parking (30)

Reallocation of road space, friendly streets and freight (7)

Submission summary	Response summary
<p>Support was expressed for reprioritising road space to accommodate changing needs including autonomous shared vehicles and reduced car ownership.</p> <p>There was support for Council's intention for local streets to be safe and plan for improved traffic flow and safety.</p> <p>Suggestions were made for traffic calming, road closures, conversion of roads into laneways and shared or walkable 'healthy streets' such as in London's City Council plans.</p> <p>Concern was also expressed with respect to increasing freight deliveries and associated impacts on noise and safety.</p>	<p>P21 and A21.1 involve implementing TfNSW's Movement and Place framework to better utilise existing road space and improve accessibility, walkability and safety. P21 addresses the importance of efficient freight connections to service more people, goods and services, and will be addressed through the preparation of a freight plan and road safety plan (A21.1). A21.2 identifies Council's intention to development LEP and DCP controls to address, delivery and waste collections; parking rates to reduce car dependency near public transport; noise mitigation on freight corridors; and requirements for car share and electric vehicles.</p> <p>P21 has been amended to clarify its intent, which is to redesign road space and facilities to match changing community needs. Changes have also been made with respect to planning for urban freight in response to a submission from TfNSW.</p> <p>A17.1 has been amended to refer to Council's work in preparing a design guidelines across all open space. This will integrate directions</p>

Submission summary	Response summary
	set out in <i>Towards 2040</i> into public domain design, such as high quality streets that support healthy living.
Change	Source
A17.1 amended to update reference to Council's public domain guidelines as an 'urban design framework and guidelines for public spaces'	Community
P21 priority heading amended from 'Road space and facilities to match changing community needs' to 'Redesigned road space and facilities to match changing community needs' (to address clarify the intent of the priority)	Community
P21, Map 25* amended to show waste facilities in relation to the LGA supported by a text box. This is supported by actions in P21 which relate to urban freight, which includes responding to increased waste collections	EPA, GSC, Community
<i>See also NSW Government Agency submissions and responses for changes made in response to TfNSW</i>	

Parking needs (29)

Submission summary	Response summary
<p>Concern was expressed that there was insufficient parking in centres and at B-Line bus stops. There was concern the proposal to reduce parking requirements in local shopping precincts would adversely impact on retail business viability.</p> <p>It was suggested that apartments should have more than one car parking space, even if near public transport, in order to mitigate on street parking issues.</p> <p>Suggestions to improve parking provision were made, such as using land at Ingleside, reducing the number of boats, trailers and caravans parking long-term on local streets and using the Manly town centre parking model.</p>	<p>Council's strategic direction is to focus efforts on improved public transport to strategic centres and prioritising pedestrians over cars in centres rather than increased parking. A21.1 involves implementing TfNSW's Movement and Place framework and Council's Transport Strategy, <i>MOVE</i> through completing action plans such as parking and local parking management plans for town centres including higher turnover parking in areas of high demand.</p> <p>A20.2 commits to new LEP and DCP controls for reduced parking requirements in centres well-served by public transport in exchange for public benefit. The intent of this action is to reduce car dependency and encourage the use of public transport. Locational specific requirements for new developments will respond to the public transport accessibility of the area to support use of public transport.</p> <p>In February 2019, Council considered the outcomes of a trial program to limit trailer parking (including boat trailers) in certain locations and resolved that Council endorse the exploration of further options to manage trailer parking as part of the future Northern Beaches Parking Plan which is a deliverable in A20.1.</p> <p>A decision on the future zoning of Ingleside is subject to the completion of a detailed bush fire evacuation study of the area with DPIE (A15.6). Council will not be in position to consider alternative uses until this work is complete.</p>
Change	Source
No changes in response to submissions	NA

P22 – Jobs, centres and retail (38)

Job opportunities and working from home (13)

Submission summary	Response summary
<p>Job opportunities</p> <p>These submissions included suggestions to improve job opportunities in the LGA, including more part-time employment opportunities for under 18s, upskilling the community, providing for higher paying jobs,</p>	<p>A22 includes a principle to attract jobs that match the skills of residents. This is to be achieved through preparation of an employment study (A22.1) and economic development plan (A22.2), new LEP and DCP controls and precinct specific profiles for each centre and business park.</p> <p>The employment study background report, that supports <i>Towards 2040</i>, identifies that population-serving jobs will grow on the Northern</p>

Submission summary	Response summary
<p>provision of specialised housing including for key workers and students and growing business parks supported by residential accommodation.</p> <p>The knowledge and creative industries were recognised along with the need to improve transport to assist with this.</p> <p>There was also a request that <i>Towards 2040</i> reflect the need to increase volunteer opportunities.</p>	<p>Beaches. It also acknowledges the challenge of the growing gap between the types of local jobs and the skills of residents and the transport constraints. The actions in P22 address this.</p> <p>P10 supports increased availability of local education opportunities (principle) which would include opportunities for training and upskilling, while P16 and A16.2 make reference to the need and prioritisation of affordable rental housing for key workers. It is noted that part-time employment opportunities are increasing, particularly in areas such as retail, hospitality and tourism, which tend to provide a large proportion of employment opportunities for young people.</p> <p>Volunteering and 'informal' employment may be something that is considered as part of the economic development plan, especially mentoring start-up businesses (A22.2). P22 was amended to acknowledge the need to expanded volunteer opportunities, in addition to employment opportunities to support independence later in life.</p>

<p>Decentralised economy including working from home</p> <p>Concern that there is too much focus on strategic centres in achieving a strong local economy since strategic centres in the Northern Beaches are low-key and sparse relative to other areas in Sydney. Suggests alternative approach of recognising unique characteristics instead e.g. decentralised tourism economy, online working and large proportion of people working from home.</p>	<p>P22 acknowledges the important role of strategic centres, in addition to local centres, working locally (i.e. work from home) and future growth industries (e.g. tourism). P22 also includes principles to foster business networks and partnerships to connect, promote and grow business.</p>
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Change	Source
P22, Figure 64* amended to update the job targets and growth for Frenchs Forest to align with current precinct planning for Phase One (from 12,000-13,000 jobs to 13,300 total jobs in 2036 and growth from 2016 to 2036 from 2,700 to 3,700 to 4,000 jobs)	Council
P22 text amended to expand opportunities for age-friendly centres to provide volunteer opportunities, in addition to employment opportunities to support independence later in life	Community
P22, Map 26* amended to clarify connections between Frenchs Forest to the Eastern Economic Corridor, include economic connections and connections to health and education precincts at Macquarie Park and St Leonards (lining to innovation triangle shown on Map 22)	Community

Centre classifications and activation (21)

Submission summary	Response summary
<p>Centre classification</p> <p>Request that Council review the classification of the nine local centres, concerned that these were only defined by the presence of a supermarket. The importance of local centres in attracting a diversity of local businesses was acknowledged along with providing local jobs and removing the need to commute.</p>	<p>The strategic and local centres were established by the GSC in the <i>Region Plan</i> and <i>District Plan</i>. Council's employment study (A22.1) provides opportunity to identify if any other centres should be considered as a 'local centre' and the preparation of an economic development plan will help build local economic capacity (A22.2).</p>
<p>Centre activation</p> <p>Council should encourage the establishment of local businesses in centres and help address commercial</p>	<p>P22 supports increasing jobs in local centres to meet the needs of the local population, strengthening strategic centres as high amenity hubs that deliver more jobs closer to where people live, and enhancing local centres to provide local retail to serve the local community.</p>

Submission summary	Response summary
sector issues such as vacancy rates. Suggestions were made to subsidise rents for local and family-run businesses, prevent franchises and luxury shops from opening up and investigating mechanisms that support the growth of creative and small-scale industries.	Actions to stimulate centres and local business will be addressed in economic development plan that responds to the findings of the LEP employment study to build local economic capacity.
Change	Source
P22, Map 26* amended to note that centres play an important role in providing for local jobs and services and are also considered employment hubs (as per the definition in the glossary)	Community

Retail including large format retail and supermarkets (7)

Submission summary	Response summary
<p>Retail including large format retail</p> <p>A number of submissions were received on behalf of the retail sector. These submissions generally supported the principles to grow the economic role of the LGA, and noted significant changes to the retail sector in particular the large format retailing sector.</p> <p>It was recommended Council ensures that the demand, benefit and needs of large-format retailers are considered in the LEP employment study and subsequent development of the new LEP and DCP controls, to provide sufficient land and controls for emerging large-format and specialised retail uses. Specific mention was made to Council permitting 'specialised retail premises' within a range of zones and areas.</p>	<p>Retail provides a key function in supporting demands of residents and creating vibrant town centres. Planning for retail is addressed in P22 and A22.1, which includes completion of an employment study that will assess demand and projected supply for retail floor space (including supermarkets) to 2036, to identify future gaps.</p> <p>The employment study has been tasked with considering the space constrained nature of the Northern Beaches, the need to protect and preserve industrial land (P28) and align job growth with skills demand by resident (P22). Outcomes of the employment study will inform the preparation of the new Northern Beaches LEP and DCP.</p> <p>In terms of current zones that would permit bulky good retail, it is really only the B5 zones (Brookvale), B6 (Manly Vale and North Narrabeen) and B7 zone at Belrose (added permitted use) which could accommodate this retail format. However, some submissions note that due to site constraints these are not preferred locations. It will be prudent to monitor the evolution of large format retail stores. There are emerging trends surrounding the growth of these stores types. However, it's important to ensure that their growth does not pull consumption away from key centres/hierarchies across the Northern Beaches. Consideration of these formats within existing B5 and B6 zones that also align with existing centre priorities should remain the focus.</p> <p>P22 has been amended to include reference to the important role of retail in the LGA, as our second largest employer.</p>
<p>Supermarkets</p> <p><i>Towards 2040</i> should acknowledge and support the role of supermarkets in anchoring local centres and providing employment. There was opposition to the blanket cap on supermarket size in neighbourhood and local centres such as the defined 1,000sqm cap as defined by the term 'neighbourhood supermarket' in B1 zones.</p>	<p>It is the Standard Instrument that requires a 'neighbourhood supermarket' not to exceed 1,000sqm. The Standard Instrument—Principal Local Environmental Plan, prepared by the NSW Government, is a legislative document that includes elements that cannot be altered in the preparation of LEPs. Council is therefore not able to amend the gross floor area for 'neighbourhood supermarkets'.</p>
Change	Source
P22 text added to acknowledge retail has traditionally played a significant role in the LGA and is our second largest employer	Community

Submission summary	Response summary
<p>Strategic centre role</p> <p>Some submissions were unsupportive of Frenchs Forest as a state-designated priority growth area and as a health and education precinct due to loss of original low-density character, sportsgrounds, green space and trees. Objections were also raised to the provision of affordable housing and medium and high-density housing in the area. These submissions were mostly concerned about increased traffic congestion caused by construction and continued operation of Northern Beaches Hospital.</p> <p>Some submissions however were supportive of proposed new strategic centre particularly the fact that Frenchs Forest will accommodate most of the growth on the Northern Beaches.</p>	<p>The NSW Government has identified Frenchs Forest as a strategic centre in the <i>Region Plan</i> and <i>District Plan</i>. This means that the area has been identified for future housing and employment growth over the next 20 years. <i>Towards 2040</i> must give effect to NSW Government planning documents.</p> <p><i>Towards 2040</i> sets a vision and aspiration for Frenchs Forest which goes over and above what would otherwise have been delivered as a planned precinct. Council continues to work closely with NSW Government agencies and to advocate for the interests and priorities of our community. These priorities include the provision of high quality open space, a low-carbon precinct with high efficiency in energy, water and waste, a Green Star rating which includes water sensitive urban design measures, urban canopy targets, design excellence and affordable housing.</p> <p>See section ‘housing supply’ with respect to the proposed discrepancy in housing figures.</p>
<p>Jobs and industry</p> <p>Questions as to the feasibility of the proposed job targets and clarification sought as to retail jobs and impacts on nearby Forestway Shopping Centre. Support was expressed for Frenchs Forest to be a health education and innovation precinct, with a suggestion for adding a med tech precinct where companies can leverage learning from the hospital.</p>	<p>Council’s role is to ensure that the application of zones and development controls protects existing employment areas whilst also ensuring opportunities for future expansion in appropriate areas. The town centre is likely to be zoned B4 Mixed use where a range of uses are permitted including retail, commercial office space and health related businesses.</p> <p>The job target for Frenchs Forest (P23) is being addressed through detailed precinct planning (A23.1). P10 identifies opportunities for research and education in health related fields at Frenchs Forest and P22 supports targeted industry sectors and fosters innovative clusters. The employment study (A22.1) and economic development plan (A22.2) will further explore health related opportunities at Frenchs Forest.</p> <p>It is expected that the proximity to the hospital will stimulate growth in health related employment both within the town centre and in the adjoining business park, while a university would stimulate employment opportunities in education and research fields as acknowledged in P23.</p>
<p>Business Park</p> <p>Submissions raised the need for strengthened connections between the hospital and town centre. The business park was seen as an opportunity to support the services for the Northern Beaches Hospital and future population.</p> <p>Property owners raised the potential for new planning controls for the business park to activate the precinct and improve amenity for staff and facilitate existing and future employment uses, including health and education industries and retail. It was suggested that Council support reinvestment and renewal through flexible building heights and floor space ratios.</p>	<p>The Frenchs Forest Business Park was identified in Council’s adopted Northern Beaches Hospital Precinct Structure Plan (August 2017) as an area for jobs growth with existing planning controls already allowing for further employment opportunity. The growing use of the hospital and the delivery of Phase One is expected to be the impetus for further economic growth and reinvestment in the area.</p> <p>The function and objective of the B7 Business Park zone is to provide for a range of office and light industrial uses and does not permit retail premises. The draft Northern Beaches Hospital Structure Plan reinforces the role of the Frenchs Forest Business Park for production, research and development (R&D) and office functions. The planned precinct adjoining town centre, will be the focus for retail and other population driven services.</p> <p>P23 includes a principle to strengthen Frenchs Forest Business Park, focusing on attracting health related businesses. This will be implemented via A23.3 which seeks to investigate opportunities to boost Frenchs Forest Business Park; connect workers to the town centre; and ensure the hospital, town centre and business park</p>

Submission summary	Response summary
	<p>function together. Any review of planning controls in this area will have regard to this action and any changes would be subject to further community consultation.</p>
<p>Sustainability</p> <p>Support for a sustainable health and education precinct, and walkable urban lifestyle to replace the existing car dominated area. Submissions raised concerns that the new centre should not come at the cost of the natural environment (including Garigal and Kuring-gai Chase national parks and Manly War Memorial Park).</p>	<p>Council is aiming for Frenchs Forest to be a Green Star Community and a low-carbon precinct with high efficiency in energy, water and waste. As described in the glossary, a low-carbon, high efficiency precinct focuses on reducing the carbon footprint through integrating energy, water, waste, transport and building efficiency, drawing on the National Carbon Offset Standard for Precincts.</p> <p>Green Star is a program that delivers a range of environmental outcomes. A23.1 seeks to finalise and implement the Frenchs Forest Precinct Plan including a Green Star Community rating and specific commitments to design excellence and energy efficiency including increased BASIX targets for all new dwellings.</p> <p>The protection of the surrounding environment, bushland and waterways will be a consideration of the project, and is addressed in P1-P4. The <i>Towards 2040</i> priorities for environmental protection align with priorities in the <i>District Plan</i> and <i>Region Plan</i> and will guide future development for both Council and the NSW Government.</p>
<p>Transport</p> <p>Suggest the new town centre should be walkable and replace the existing car dominated area. There was support for mass transit to service the area and requests that Council work with NSW Government to finalise transport plans and end roadworks. Suggestions were made to improve transport to the Pittwater area and questions raised as to the proposed pedestrian link to Narrabeen Lagoon.</p>	<p>A23.1 seeks to finalise the Frenchs Forest Precinct Plan and A23.7 identifies the need to deliver transport projects in P19 for Frenchs Forest. P23 includes principles to guide planning for the area, including integration with the area's bushland, connecting to the broader active travel and public transport network and prioritising walking in the town centre.</p> <p>The Greater Sydney Green Grid project between Northern Beaches Hospital and Narrabeen Lagoon (P5) would be subject to feasibility and environmental assessment and need to be considered in the context of any upgrades to Wakehurst Parkway as identified in Council's Transport strategy <i>MOVE</i> (A20.1).</p>
<p>Community facilities</p> <p>Submissions raised questions as to the location of the proposed community facilities, with concerns that changes to Aquatic Reserve will have an adverse impact on natural areas.</p>	<p>An infrastructure analysis was prepared as part of the Frenchs Forest Precinct Plan to identify the future infrastructure requirements of the precinct, including social infrastructure. A community hub is envisaged in the town centre in addition to joint-use opportunities which are being explored by DOE for the Aquatic Reserve precinct.</p> <p>The location for the future recreation and community facilities will be delivered under the Frenchs Forest Precinct Plan and subsequent LEP and DCP controls which are yet to be finalised.</p>
<p>Open space</p> <p>Concern that the plan would result in an overall loss of open space, including sports grounds. Questions were also raised as to the target of 30% landscaped area site control and 25% tree canopy target set in A23.1.</p>	<p>P6 includes a number of principles that focus on the quality of open space and recreation opportunities as opposed to the volume of space. These principles include improving the provision, diversity and quality of open space for recreation, and space that is flexible, versatile, multifunctional and fit for purpose, meeting demand and diverse community needs.</p> <p>A diverse range of high quality recreation opportunities are being planned for Frenchs Forest which significantly improve on the diversity and quality of opportunities that are currently available on these sites.</p> <p>The precinct planning process has identified a desired outcome to retain mature trees on the town centre site to improve urban design outcomes and to maintain tree canopy within the precinct (A23.1). The 25% tree canopy target is based on NSW Government benchmarks for medium to high density residential areas.</p>

Submission summary	Response summary
<p>School relocation</p> <p>Submissions against moving the Frenchs Forest High School to Aquatic Drive with concerns this would diminish open space, conflict with environmental zones and place the school in a bush fire prone area. Concern was expressed of the cumulative loss of education land including Beacon Hill High School, Seaforth TAFE and other sites reserved for education.</p> <p>It was noted the timing given in <i>Towards 2040</i> for finalising the Frenchs Forest Precinct Plan has been given an immediate time priority, but the masterplan for an education and recreation precinct has a short to medium timeframe. It was suggested that priority be given to retaining the school site as part of the 'health and education precinct'.</p> <p>Those who supported moving the high school noted potential improvement of congestion and opportunity to integrate the pool with the high school.</p>	<p>According to DOE, the aspiration for any relocation of the high school would be to establish a benchmark secondary school that is integrated with the broader community and sporting facilities. Locating Frenchs Forest High School within the Aquatic Reserve precinct will support enhanced recreation outcomes for both the school and the broader community through shared use of high quality facilities.</p> <p>Council investigated a number of alternative sites and presented this to DOE. DOE's preferred site was Aquatic Reserve. The proposed school development will be required to undergo extensive environmental impact assessment processes as part of the development application process. This will require consideration of impacts to the conservation values of the State Park. The existing high school will not be relocated until a suitable alternative location is identified and new facilities constructed.</p> <p>As our population grows the availability of land is becoming increasingly constrained. A10.2 outlines Council's commitment to working with DOE to respond to expected increase in school students. DOE has responded in recent years with more innovative models of delivery including vertical schools.</p>
<p>University</p> <p>It was suggested the timing of the new university should be ahead of the growth in residential and retail, that the university be integrated with the Northern Beaches Hospital and that it should be located within the town centre.</p>	<p>P10 encourages the investigation of a university in a strategic centre. While Council has been proactively working to locate a university presence at Frenchs Forest, the timing and delivery of this outcome is dependent on a number of factors beyond Council's control.</p> <p>Council has been working with universities to determine their future needs and preliminary advice received is that they would like certainty in the planning controls prior to making a commitment to locate at Frenchs Forest. Although co-location with the Northern Beaches Hospital brings about many opportunities, further research and consultation will dictate the final form and location of any future education facility in the Northern Beaches.</p> <p>The preferred location for a university at Frenchs Forest is within the mixed use town centre where it would benefit from the amenity and support the vibrancy of the town centre. Given the town centre is to be delivered within Phase One, it would be likely that development of a university could occur before additional dwellings are delivered as part of Phase Two (10 years) and Phase 3 (10 years +).</p>
Change	Source
Figure 18 amended to update the targets for new jobs from 7,000-13,000 to 9,000-13,000 to align with the Frenchs Forest precinct planning	Council
P22, Map 26* amended to clarify connections between Frenchs Forest to the Eastern Economic Corridor, include economic connections and connections to health and education precincts at Macquarie Park and St Leonards (lining to innovation triangle shown on Map 22)	Community
<i>Towards 2040</i> maps, figures and text updated to change reference from 'Frenchs Forest Planned Precinct' to the 'Frenchs Forest strategic centre'. The term 'planned precinct' is only applicable when referring to Phase One.	Council
P23, Figure 66* amended to clarify that the jobs targets relate to Phase One of the planned precinct, including updates to job targets (growth from 2016 to 2036 from 3,700 to 4,000 jobs)	Council
P23 text and Figure 67* amended to clarify that future phases of the Frenchs Forest Planned Precinct will be located in the strategic centre, with updates to Figure 67* more clearly delineating the boundary and location of the Planned Precinct – Phase One and the Warringah Aquatic Centre as part of the education and recreation precinct	TfNSW, Council

Submission summary	Response summary
A23.2 amended to change reference from the 'Warringah Aquatic Centre' to 'Aquatic Reserve' when referring to the Master plan for a state-of-the-art education and recreation precinct	Council
A23.5 amended to change reference from preparing a 'Section 7.11 contributions plan under the EP&A Act' to just a 'contributions plan' to allow flexibility in determining the most appropriate funding source for local infrastructure provision	Council
A23.6 amended to clarify that the need to prepare 5 yearly updates relating to the Green Star Communities rating is a requirement of the Northern Beaches Hospital Precinct Structure Plan (not the LEP studies), and that these updates will address the findings of the LEP studies (e.g. housing, employment and social infrastructure)	Council
<i>See also NSW Government Agency submissions and responses for changes made in response to the GSC and TfNSW</i>	

P24 – Brookvale (19)

Submission summary	Response summary
<p>Strategic centre role</p> <p>Support for Brookvale as a strategic and innovation centre and the revitalisation of Brookvale, suggesting the need for green planting and pedestrian links and active uses including on upper levels. Support was also expressed for new housing if this would ease pressure on other areas in the LGA, especially the former Pittwater area. Questions were raised on the status of the draft Brookvale Structure Plan.</p>	<p>The vision of Brookvale as an employment and innovation centre (P24) is founded on the strengths of the centre which include its tradition in innovation together with aspirations to maintain it as a key 'employment-based' centre for the LGA.</p> <p>P24 supports revitalisation of Brookvale strategic centre through review of the draft Brookvale Structure Plan (A24.3) which will address the strategic directions of <i>Towards 2040</i>, including P5 which supports other forms of green cover and reduction of heat island effect in areas such as Brookvale. A24.3 also identifies that the review of the Brookvale Structure Plan will be undertaken to inform change to LEP and DCP controls. This will include further detail and will be subject to a separate community engagement process.</p> <p>See section 'housing supply' with respect to the proposed discrepancy in housing figures.</p>
<p>Traffic and transport</p> <p>Some submissions raised concerns with increased congestion in the area and limited parking that would come with growth. The need to progress road upgrades were highlighted.</p>	<p>Brookvale is identified as a strategic centre in the <i>District Plan</i> accessible via the B-Line. Development in the centre supports the region's vision for a 30-minute city and reduced dependence on cars.</p> <p>P24 actions include commitments to work with TfNSW to improve Pittwater Road functionality including completion of the Brookvale – Dee Why Transport Study (A24.1) and preparation of State and local contributions plans to fund future infrastructure improvements (A24.4). These actions will look to balance growth with infrastructure and to support how people move to and from the jobs and services in the employment lands.</p>
<p>Jobs, industry and land use conflicts</p> <p>Concerns were raised that allowing residential development in this area would sterilise industrial lands and limit uses that match local skills.</p> <p>A submission from Boral's Concrete Batching plant raised the importance of protecting existing industry and concerns with allowing additional uses that would result in land use conflict such as food and/or drink manufactures to operate. In order to protect existing uses, it was suggested that new proponents must demonstrate their development is compatible with nearby uses.</p>	<p>P24 and P28 contain principles to preserve the integrity of employment lands. Specifically, P28 includes principles to 'safeguard employment land from non-compatible uses, particularly residential and mixed use development' and 'support industrial and urban services by managing the interface with adjoining land uses and ensuring residential development does not sterilise industrial or urban services land'. To strengthen this, A28.1 was amended to ensure the employment study and subsequent new LEP and DCP controls also ensure uses in employment lands or adjoining areas are compatible with existing uses.</p> <p>P24 includes a principle support Brookvale as an employment based centre and seek to preserve the industrial integrity of industrial zoned land. A24.3 seeks to review the draft Brookvale Structure Plan and develop LEP and DCP controls to support the growth of Brookvale as a transit supportive employment centre. The actions in P24 identify a number of studies that are required to be completed to inform</p>

Submission summary	Response summary
<p>Questions were also raised as to how planning controls would change to grow job opportunities in the area.</p>	<p>changes to planning controls, including the Brookvale-Dee Why transport study, employment study and local housing strategy.</p> <p>A22.1 also identifies that Council is completing an employment study which will identify opportunities to achieve the specified job targets for the centres.</p>
<p>Manly Warringah Rugby Leagues Club site and B5 zone on Pittwater Road</p> <p>Submissions were raised from a number of businesses supporting an independent review of rezoning for this site and surrounding area. Requests were made for revitalisation to activate the area (e.g. residential) and address limits to business growth (car parking, general accessibility issues, outdated facilities and mix of uses, lack of complimentary uses with necessary foot traffic and lack of open spaces).</p>	<p>The proposed introduction of a wider range of activation land uses, particularly housing, in the B5 Business Development zoned land overlooks the existing local planning provisions. These support a mixed use town centre for Brookvale at the southern end of the Pittwater Road corridor in proximity to the Brookvale B-Line stop and Warringah Mall. Furthermore, principles in P24 or P19 look to focus growth within 800m of high frequency public transport. The introduction of a residential population into the B5 Business Development area would not properly address P28 to safeguard employment land.</p> <p>The outcomes of the employment study will inform the preparation of the new Northern Beaches LEP and DCP, and this is expected to reinforce protection/retention of industrial lands, as well as the value of significant business parks (e.g. Frenchs Forest and Warriewood) for mixed industrial/logistics/office functions.</p>
<p>Warringah Mall</p> <p>A submission from Warringah Mall requested the Brookvale Structure Plan be finalised and integrated into the final <i>Towards 2040</i> in the short term and align with previous high-level aspirations of Scentre for the Warringah Mall site. They recommended the development of the night-time economy in Brookvale and that Council acknowledge the Warringah Mall's role to support a range of entertainment, dining and recreational activities within a design that promotes activation and safety. Warringah Mall requested that Scentre be consulted during development of planning controls of Warringah Mall (24.2), including the opportunity to expand, connect and integrate with the surrounding built form in Brookvale.</p>	<p>Work to finalise the Brookvale Structure Plan is continuing with updated traffic and transport and employment studies nearing completion (A24.1 and A24.3).</p> <p>Development of detailed planning controls is integral to development of the Northern Beaches LEP and DCP. The LEP and DCP process will include further community engagement which will provide opportunity to focus on site and local area specific planning controls.</p> <p>A24 identifies that Brookvale will support the night-time economy however it is not the intent of <i>Towards 2040</i> to recognise the role that individual local businesses play in contributing to the night time economy. A30.1 commits to the preparation of a night time economy strategy. This will include community engagement and the Northern Beaches community, including those representing Warringah Mall, will be invited to make submissions.</p>
Change	Source
<p>Strategic context text amended to include a reference Brookvale and Dee Why strategic centres. Brookvale as an employment-based centre, supporting one-third of the LGA's jobs. Dee Why as a mixed use centre supporting higher density living.</p>	<p>Community</p>
<p>P24 text amended to acknowledge Warringah Mall as an example of the significant role of private sector in strategic centres</p>	<p>Community</p>
<p>P24 text amended to acknowledge organisations and businesses that offer social, lifestyle and community functions, such as Manly Warringah Leagues Club</p>	<p>Community</p>
<p>P24.4 amended to clarify that Council will 'investigate' not prepare a state contribution plan along with local contribution plans for funding transport and amenity improvements. The state contribution plan was updated to a reference a Special Infrastructure Contributions Plan which is the role of the NSW Government</p>	<p>Council</p>
<p><i>See also NSW Government Agency submissions and responses for changes made in response to TfNSW</i></p>	

P25 – Dee Why (11)

Submission summary	Response summary
<p>Jobs</p> <p>Suggestion to specifically designate retail/ business and not allow residential in areas along Pittwater Road and the Strand Beach for employment purposes.</p>	<p>Although parts of Dee Why are presently occupied by commercial buildings, the Dee Why town centre, along with the strand, is zoned for mixed commercial/residential development in the <i>Warringah Local Environmental Plan 2011</i>. There are currently no plans to review these provisions.</p>
<p>Night life</p> <p>The potential for night life on Dee Why beach front was noted and a request from Dee Why RSL to acknowledge their role in this area.</p>	<p>P25 includes a principle to support night-time and cultural opportunities in Dee Why. Figure 71* illustrates the strong linkages between the town centre and beach front.</p> <p>A22.4 commits to the preparation of a night-time economy strategy across the LGA which will be able to focus on centres appropriate for a night-time economy. It is not the intent of <i>Towards 2040</i> to recognise the role that individual local businesses play in contributing to the night-time economy.</p>
<p>Dee Why RSL</p> <p>A submission from the Dee Why RSL requested that Council ensured an ongoing review of planning controls within the town centre and adjacent land, including flexibility to meet employment and housing targets or additional permitted uses on the Club site to support the night-time economy and deliver varied uses and activities in the area.</p>	<p><i>Towards 2040</i> is a strategic document that establishes planning priorities and principles to guide land use planning decisions. It does not address planning outcomes on a site specific basis such as specific change to the land use zone or other development controls.</p>
<p>Housing growth</p> <p>A submission from the a religious organisation was supportive of investigation for increased housing diversity in existing residential areas, focusing on areas up to 1.5km from strategic and local centres with high-frequency public transport. They recommended that <i>Towards 2040</i> be amended to support future uplift within 800m of the Dee Why local centre and allow five-storey development (subject to urban design testing). They also noted the unlikelihood of redevelopment in existing R3 zones due to the high proportion of strata-titled land.</p>	<p>Preliminary investigations identified that there is existing housing capacity within Dee Why town centre under the existing planning controls and those that support implementation of Dee Why Town Centre Masterplan adopted by the former Warringah Council in 2013. Existing land use zoning in the centre accounts for constraints on the local road network, which are currently being reviewed as part of planning for Brookvale strategic centre.</p> <p><i>Towards 2040</i> identifies that future centre growth will be focused in Brookvale and Frenchs Forest. Notwithstanding this, P15 identifies that Dee Why will be investigated for medium density housing up to 1.5km from the town centre, as part of the local housing strategy.</p>
<p>Urban design</p> <p>Comments were made that Dee Why does not represent the best urban design outcomes. A lack of green space and amenity was highlighted along with the need for a broad and long term vision. Rubbish issues were noted along with the need to improve street lighting to improve safety at night. Many submissions also objected to further development on the Northern Beaches that reflected that in Dee Why.</p>	<p>A25.1 involves implementation of the planning proposal for Dee Why Town Centre Master Plan 2013, which includes public domain upgrades and improvements to open space. Recent upgrades include Walter Gors Park, Redman Road Plaza, new paving, landscaping and street furniture, a new shared path on Howard Avenue linking the town centre and Dee Why beach and the new Dee Why Plaza as part of the Meriton Retail Precinct.</p> <p>Future planning controls for Dee Why town centre will need to address design excellence controls in the new LEP and DCP (A17.1) and address the a design excellence review panel once established (A17.4).</p>

Submission summary	Response summary
Change	Source
Strategic context text amended to include a reference Brookvale and Dee Why strategic centres. Brookvale as an employment-based centre, supporting one-third of the LGA's jobs. Dee Why as a mixed use centre supporting higher density living.	Community
P25, Figure 71* amended to reference Triangle Park	Community
P25 principle amended to reference Dee Why Lagoon only, rather than Dee Why Lagoon South Catchment when proposing to increase street tree planting and minimise impacts	Council
A25.4 amended to remove reference to the Delivery Program when referring to the new roads, laneways and open space identified in the Dee Why Town Centre Master Plan 2013 and the Section 7.11 Plan for Dee Why	Council

P26 – Manly (14)

Submission summary	Response summary
<p>Heritage</p> <p>One submission raised the importance of Manly for its historical characteristics, while another suggested revoking the heritage listing of Manly oval and providing a carpark under the oval with a world-class town square that brings in cafes, bars, events and virtual library.</p>	<p>Manly's Ivanhoe Park (including Manly Oval) is listed on the NSW State Heritage Register. There is broad community support for the current heritage listing of Manly Oval and this is not proposed to change. The Manly 2015 Masterplan considered the concept of relocating the current car parking provided in Whistler Street Car Park to under Manly Oval. However, following much public debate this approach will not be pursued.</p> <p>Manly's history is addressed in P26 which acknowledges Manly's history and social significance and P18 which seeks to protect, conserve and celebrate heritage.</p>
<p>Strategic centre role</p> <p>Support for Manly as a strategic centre and commercial hub and key area for employment growth.</p>	<p>P26 recognises Manly's commercial importance as a strategic centre, particularly with regard to jobs, tourism and retail. Council is due to commence work on a place plan for Manly in 2020, as part of this work we will engage broadly with the community to establish the vision for the future of Manly (A26.1).</p>
<p>Housing growth</p> <p>Some submissions supported housing growth in this area, including increased building heights in higher density areas and more shop top development. Questions were raised as to why Manly was not included in the Housing Map at Figure 18.</p>	<p>Figure 18 shows locations where there is either existing housing capacity or identified future housing supply. Manly has not been identified on this diagram as it does not have significant capacity under current controls and it does not have any planned housing in the centre. However, P15 Map 18* identifies opportunities for housing diversity in the broader Manly catchment.</p> <p>A26.1 includes preparation of a place plan for Manly and LEP and DCP controls to responds to LEP studies (which includes the local housing strategy). Any potential changes to housing in Manly will be informed by the local housing strategy and the place plan.</p>
<p>Tourism</p> <p>There was some support for Manly's role as one of Sydney's top tourist destinations, and some objections. Those in support recognised the opportunity that Manly provides for tourism growth while meeting the 30-minute measure.</p>	<p><i>Towards 2040</i> is prepared in the context of the Greater Sydney Region. P26 and P29 acknowledges that the Northern Beaches is a valuable tourism asset more broadly for NSW and Australia, with specific reference made to Manly Beach. P26 and P29 identify Manly's important role in the tourism economy, its connections to Sydney CBD and its 30-minute catchment.</p>
<p>Transport</p> <p>Manly Wharf should to be highlighted as a key transport hub in <i>Towards 2040</i>. It was recommended the creation of a 24/7 blue corridor between Manly and the Sydney CBD be included as an action.</p>	<p>P9 already identifies wharf and ferry services as a public transport and infrastructure collaboration project. The blue highway is shown on Map 1 Structure Plan, however a number of changes have been made to further illustrate the importance of the Manly-CBD as a regional transport link (P19, Map 22* and A19.8 to also include investigation of improved ferry services). P26, Figure 72* was amended to identify Manly transport interchange as a key element in the centre.</p> <p>Council's strategic direction is to focus efforts on improved public transport to strategic centres, rather than increased parking. A29.4</p>

Submission summary	Response summary
Concern was expressed on limited car-parking particularly given its role as a tourism precinct.	identifies Council's intent to prepare a public transport plan to improve tourism connections will identify opportunities to enhance public transport for tourists. P19 also identifies the need for improved public transport between Manly and Brookvale-Dee Why.
<p>Public domain</p> <p>Recommends renewal of Manly Interchange and entertainment precinct near the wharf, including a boardwalk to Manly Pavilion and South Steyne Beach, especially given this role as a tourism precinct.</p>	P26 and A26.1 supports preparation of a place plan for Manly which will address the strategic directions set out in <i>Towards 2040</i> . This plan will need to address P17 including Council's public domain guidelines and LEP and DCP controls to improve design criteria for the public domain (A17.1)
<p>Novotel Manly Pacific</p> <p>This submission stated the planning controls (height and FSR) for the B3 zoning of 56-58 North Steyne and 2 Raglan Street are too restrictive for tourist-oriented developments.</p> <p>An increase in planning controls is sought to allow renewal and refurbishment of the site to support P26 and P29.</p>	<p><i>Towards 2040</i> is a strategic document that establishes planning priorities and principles to guide land use planning decisions. It does not address planning outcomes on a site specific basis such as specific change to the land use zone or other development controls.</p> <p>A future review of Councils planning controls will be undertaken through the preparation of a new LEP and DCP which will be subject to further community consultation.</p>
<p>Manly Hospital</p> <p>Requests the former Manly Hospital site be explored as a potential off-site campus, focusing on health, for ICMS.</p>	The Former Manly Hospital site is identified as a collaboration project in P9. An action (A26.4) has been added to P26 for Council to work with DPIE to develop a place-based masterplan for the site. The nature of future uses on the site is yet to be determined.
<p>North Head</p> <p>Suggestion for use of North Head Barracks for low cost temporary housing to allow essential service workers to live close to work or low rent tech hub for start-ups. There was also a submission suggesting this site could be used for wind or solar farm and sustainable education centre.</p>	<p>Council has limited influence in the future of this area as they are not the land owner. The land at North Head is comprised of National Park, managed by National Parks and Wildlife Services, and North Head Barracks are currently owned and managed by Sydney Harbour Federation Trust. Future uses of this area are restricted due to the need to protect the environment and heritage values, bush fire threat and the lack of transport accessibility.</p> <p>The Sydney Harbour Federation Trust Management Plan – North Head Sanctuary (2011) outlines the Trust's vision for creation of a sanctuary which includes the adaptive re-use of buildings and facilities with uses that will complement the Sanctuary and respect their defence heritage.</p>
Change	Source
P19, Map 22* amended to clarify the Manly-CBD ferry is our blue highway, as per the Structure Plan	Community
P26 text amended to clarify that better connections to Manly Wharf will improve access to the rest of the LGA, not just Warringah Mall, the B-Line, Manly Andrew 'Boy' Charlton Aquatic Centre and sportsgrounds at North Manly	Community
P26, Figure 72* amended to identify Manly wharf area as a transport interchange as a key element of the centre	Community
P26 principle amended to clarify the need to improve links to North Head and the former Manly Hospital site, regardless of future uses	Community
P26 principle amended from 'support co-working spaces for professional jobs' to be more broad and encourage spaces and facilities that promote flexible working, local professional employment and innovative start-ups including community spaces, commercial co-working and satellite offices	Community
A26.4* added to acknowledge the collaborative work underway by Council and DPIE, to plan for future uses at the former Manly Hospital site. This is also acknowledged in P9, Map 12*	DPIE – Development and Transactions, Community

Submission summary	Response summary
<p>Strategic centre role</p> <p>Some submissions were supportive of Mona Vale as a strategic centre and employment and service centre for the northern part of the LGA.</p> <p>It was highlighted that Mona Vale is not a strategic centre in the same context as Dee Why, Brookvale, Manly or Frenchs Forest. It was also suggested that Mona Vale works with Warriewood to serve the area and the two areas should be studied together.</p>	<p><i>Towards 2040</i> recognises Mona Vale as the strategic centre for northern end of the LGA and will have an important role in providing population-serving commercial floorspace for projected population growth, both within Mona Vale and its wider catchment. Place-based planning approaches will consider how job and housing outcomes can be achieved, taking into consideration take-up rates and feasibility.</p> <p>Mona Vale is identified as a strategic centre in the <i>District Plan</i>, however, <i>Towards 2040</i> acknowledges that the strategic centres are to be considered together with local centres, such as Warriewood and other employment hubs.</p>
<p>Housing diversity</p> <p>Support was expressed for increasing housing diversity in the area including medium density housing to support population-serving workers, multigenerational households and older people wishing to remain in the area.</p>	<p>P15, Map 18* identifies Mona Vale strategic centre as an opportunity for investigation of medium density housing around the centre. A15.1 includes preparation of a local housing strategy that will ensure the supply and mix of housing responds to community needs.</p> <p>It is noted that Mona Vale strategic centre has housing capacity under current planning controls. The local housing strategy will consider how to unlock this land and provide opportunities for housing diversity near the centre that complements the village character and addresses changing housing needs, household types and demographics (A15.1).</p> <p>P12 identifies the ageing population as an important planning consideration, which will be addressed through A12.4, preparation of a social infrastructure study and specialised plans including for seniors.</p>
<p>Against further growth</p> <p>Some submissions were opposed to the redevelopment of Mona Vale, due to potential overcrowding of beaches and infrastructure. It was suggested that Mona Vale is currently not suited for large increases in facilities and population.</p>	<p>P9 includes a principle to sequence and fund growth and infrastructure in strategic centres, such as Mona Vale. This will ensure that any redevelopment is carefully staged and managed.</p> <p>A15.1 includes preparation of a local housing strategy that will ensure new housing is located in the right locations and is subject to Council planning controls that have regard to local character (A17.1).</p>
<p>Mona Vale Place Plan</p> <p>Submissions noted resident concerns regarding the previously exhibited Mona Vale Place Plan, especially plans to revitalise the centre and potential major development and high rises.</p> <p>It was highlighted that future place planning should ensure that new infrastructure and facilities are best practice and in keeping with village character with respect to height, density, pedestrian access and open space.</p>	<p>P27 identifies Mona Vale as the urban heart of the north and acknowledges that Mona Vale has a village atmosphere. It sets out strategic direction to guide planning for Mona Vale strategic centre, including preparation of a new place plan (A27.1) which is to be completed within the next 5 years. The place plan will be undertaken in consultation with the local community and will inform the desired built form and density of the centre and surrounding locality.</p>
<p>Transport</p> <p>Support was expressed for improved transport to the Northern Beaches Hospital and improved bus services to Palm Beach via Newport.</p>	<p>Although connections from Mona Vale to Northern Beaches Hospital (Wakehurst Parkway) are not identified as a key transport project in <i>Towards 2040</i>, opportunities for improved connections across the LGA will be considered in Council's public transport plan (A19.1).</p>

Submission summary	Response summary
Change	Source
P27, Figure 73 amended to show Mona Vale beach, Mona Vale hospital, Village Park and civic heart, B-Line stop, Pedestrian connections and Kitchener Park	Community
P27 principle amended to ensure work to revitalise and improve public areas includes access to and connectivity between key sites in the strategic centre	Community
P27 principle added to encourage infrastructure to support home based businesses including flexible work spaces, co-working and tele-conference	Community
P27 text and A27.2 amended to clarify Council's intent to deliver a contemporary art and creativity centre in Mona Vale (to reflect terminology in Arts and Creativity Strategy)	Community

P28 – Employment lands and managing conflicts (16)

Submission summary	Response summary
<p>Employment lands</p> <p>Most submissions supported protection of employment lands, acknowledging the important role these lands had on providing local employment. This included support for prohibiting residential uses in current industrial land and in areas serviced by public transport.</p> <p>The need to adapt to emerging land uses and trends was also mentioned, including online retailing, automation, high-bay warehousing, and multi-level warehousing.</p>	<p>The Employment Background Report reinforces the valuable role of employment lands for production uses and the need to protect these areas as per the GSC directive to 'retain and maintain' all industrial zoned land in the LGA and P28. The employment study (A28.1) will include a review of industrial and urban services land, taking into consideration current trends, including online retailing and associated changing warehousing and freight needs. This will inform the preparation of the new Northern Beaches LEP and DCP.</p> <p>P28 also recognises the need to plan for a transitioning economy, such as advanced manufacturing and logistics (including vertical warehouse and last mile delivery). Given space constraints on the Northern Beaches, the employment study is seeking to understand opportunities for more innovative use of existing floorspace, particularly within our town centres to protect and preserve our limited industrial lands.</p> <p>The employment study will also address evolving technology and the implications this will have for our industrial precincts (A22.1). The Employment Study Background Report, which was exhibited alongside <i>Towards 2040</i>, considers changes in freight transportation and advanced manufacturing. The increasing demands on our industrial precincts anticipated from these changes further reinforces the need to protect our industrial lands to ensure these precincts support the functioning of our city, particularly activities that are unsuitable for co-location due to land use conflicts.</p>
<p>Managing conflicts</p> <p>Submissions raised concerns with land use conflicts including the need for business trading hours for small businesses such as breweries even when near residential areas, such as in Brookvale. Mention was also made of conflicts between residential uses in streets in Brookvale and Mona Vale near industrial areas that needed protection from industrial activity.</p>	<p>An appropriate balance is required to protect both existing residential and employment uses having regard to issues such as noise, odour and the like. This is addressed at A28.1 to prepare LEP and DCP controls to protect land use interfaces.</p> <p>P28 includes a principle to support industrial and urban services by managing the interface with adjoining land uses and ensuring residential development does not sterilise industrial land or urban services.</p> <p>Council's planning controls also need to ensure that new industrial or commercial developments in proximity to existing residential development are able to maintain the amenity of existing residents. P8 has been amended to ensure the new LEP and DCP include best practice environmental management of air, noise and water pollution.</p> <p>Changes have been made throughout <i>Towards 2040</i> to address land use conflict in response to a submission from the EPA.</p>

Submission summary	Response summary
<p>Increasing flexibility</p> <p>Several submissions raised the need for flexible land uses in mixed use/industrial zones as key to facilitating innovative development within employment lands, including the provision of affordable housing.</p>	<p>P28 aims to safeguard employment land from non-compatible uses, particularly residential and mixed use development. P15 also includes a principle to avoid residential development in industrial precincts and business parks. Council will work towards improving the supply of affordable housing in appropriate areas, which do not include employment lands.</p>
Change	Source
<p>See also NSW Government Agency submissions and responses for changes made in response to EPA</p>	

P29 – Tourism management, opportunities and short term accommodation (23)

Submission summary	Response summary
<p>Tourism management</p> <p>Some submissions were unsupportive of Council's plan to address tourism.</p> <p>Several submissions raised the need to control the impacts of tourism and ensure it does not destroy the local character and amenity of the area. It was suggested that any tourism be low key and gentle and protect the natural character including of seaside villages.</p> <p>Suggestions to improve management included limiting large commercial or private events (markets, film projects) and controlling tourism numbers. Examples of overcapacity to avoid included 'Sculptures by the Sea' and in Hyams Beach.</p>	<p>The Northern Beaches attracts an estimated 3M visitors per year. Tourism contributes twice as many jobs to the Northern Beaches economy and double the revenue compared to the NSW average, with the largest group of visitors to the Northern Beaches being visiting friends and relatives of our residents.</p> <p>P29 includes a principle to plan for a strong tourism economy while maintaining quality of life and protecting the environment. This will further addressed through preparation of a destination management plan (A29.1).</p> <p>The destination management plan (A29.1) will provide guidance to ensure that tourism continues to support the local economy and local amenity while considering and protecting the unique natural environment and cultural attributes of the Northern Beaches. It will aim to manage seasonality, increasing the length of stay, increasing visitor spend and dispersing visitors across the region as opposed to targeting growth in overall visitor numbers.</p> <p>Events, including filming are often governed by existing planning legislation, including both Council and NSW Government controls. In some cases, these events may not require development consent. Where a development application is required, Council would consider the impacts of the development on a case-by-case basis, including frequency.</p>
<p>Tourism opportunities</p> <p>Several submissions raised the many opportunities for a more diverse tourist economy on the Northern Beaches due to key natural assets such as beaches, Pittwater Waterway, the hinterland area and the Coast Walk.</p> <p>The area's cultural history was also listed as an opportunity including Aboriginal art in national parks and the recognition of Aboriginal connection and respect for the natural environment.</p> <p>The need for improved facilities was also discussed, including park and ride facilities, public transport, way finding signage and real time parking applications. It was suggested that Council address opportunities for off-peak tourism.</p>	<p>P29 includes principles for supporting a strong tourism economy while protecting the environment and for sustainable, nature based and Aboriginal culture based tourism that respects the environment. The destination management plan and employment study address opportunities and inform new LEP and DCP controls and planning processes to remove barriers to the tourism economy.</p> <p>Historical connections (Aboriginal and European) and natural environment values will feed into the destination management plan. A13.3 within P13 outlines Council's intent to work with the MLALC to implement initiatives in their community land and business plan including tourism strategies and aspirations for a cultural centre.</p> <p>P29 also references the promotion and integration of the coastal walks with centres, this is intended to look at opportunities to enhance visitation to smaller centres along the Coast Walk to boost local businesses.</p> <p>The tourism economy will also be addressed in place plans (A29.6) and a public transport plan that will address improved tourism connections (P29.4).</p>

Submission summary	Response summary
<p>Short term accommodation</p> <p>Several submissions raised concerns with short term accommodation such as Airbnb and impacts on the local business economy which rely on year-round residents. It was considered this trend was also contributing to housing affordability issues on the northern end of the LGA. Calls were made for Council to consider stricter planning controls for these accommodation types.</p> <p>One submission encouraged the need for boutique, upmarket accommodation sensitive to surroundings while another raised concerns with proposed plans by NPWS to develop short-term accommodation.</p>	<p>P29 aims to ensure a range of well-designed tourist accommodation in appropriate locations. Any future accommodation must accord with the principles in P29 and be well-designed and appropriately located. The destination management plan (A29.1) will include further detail on opportunities for tourist accommodation and will inform new LEP and DCP controls.</p> <p>A new regulatory framework for short-term rental accommodation, Draft State Environmental Planning Policy (Short Term Rental Accommodation) is currently being considered by DPIE and will provide a greater level of control in relation to short-term accommodation at a State level.</p>

Change	Source
P29 text amended to reference updated statistics from Tourism Research Australia. This clarified the contribution of international visitors to the Northern Beaches as 35%, not 36%, and the contribution to the local economy of \$500 million updated from the \$2.5 billion reference from 2016-17. Tourism Research Australia was added to the reference list and endnotes. This aligns with information in Council's draft destination management plan.	Council
P29 text amended to expand on the role and opportunity for local heritage and culture in tourism. This is in addition to the recognition of 'shared heritage' as one of the themes identified outlined in Council's draft destination management plan (DMP) (Figure 77*)	Heritage DPC, Community
P29, Map 32* amended to add Coast walk and Bondi to Manly Walk	Community

P30 – Night-time economy (17)

Submission summary	Response summary
<p>Many submissions were supportive of this priority, highlighting a lack of things to do at night, other than drinking venues, and difficulty in getting a meal after 9pm. The lack of live music venues and popularity of 'one-off' live music events was also mentioned. Suggested locations to improve the night-time economy included Brookvale, Dee Why, Manly, Mona Vale and Frenchs Forest.</p> <p>Support was expressed for smaller venues (e.g. small wine bars), footpath dining and laneways with live music.</p> <p>Some submissions were unsupportive of additional night-time entertainment, particularly in the former Pittwater area, due to concern about alcohol-fuelled misbehaviour and the limited availability of police to respond to calls in the area.</p> <p>The need to provide activities for young people was also a key issue in order to reduce unsafe partying.</p>	<p>P30 aims to deliver a diverse night-time economy. We will prepare a night-time economy strategy to broaden the range of night-time activities and manage the economy's sustainable growth while minimising potential land use conflict.</p> <p>P30 identifies the importance of a place-based approach to planning for the night-time economy in recognition that different uses are appropriate for different locations. Dee Why, Brookvale and Frenchs Forest are identified as areas to address opportunities as these places will grow and change. The night-time economy will also be addressed in the Mona Vale and Manly Place Plans identified in A30.3</p> <p>Council does not have blanket restrictions on hours of operation for businesses such as pubs, clubs and bars in its planning controls. Potential impacts on the local community are assessed during the development application process where Council may identify certain restrictions in its development approval. Council will look to broaden the range of night-time activities in the night-time economy strategy (A30.1) and in the review of planning controls to address late-night venues, live music, noise controls, safety, trading hours, existing barriers and the shift to smaller venues (A30.2).</p> <p>Providing music festivals is not a primary responsibility of local government, with the vast majority of these being provided by private promoters. Council does recognise the social, artistic and economic benefits of such events, and as such has an event grant program, which provides financial assistance and fee waivers to support to</p>

Submission summary	Response summary	
	<p>successful applicants. For example, Council has supported the Northern Beaches Music Festival for many years and the All Ages 'A Day For The Beaches Festival' held at Rat Park on 16 November 2019, which had 4,000 patrons and Northern Beaches bands. Council also supports full commercial events through facilitating concert venues, such as The Drop Festival which took place at Kierle Park, Manly in 2019, and is again scheduled to take place in March 2020.</p> <p>Safety is a fundamental aspect of planning for a night time economy. Anti-social behaviour and alcohol related violence issues are attributed to a lack of structured activity and activation of spaces. Research shows that broadening options within the night-time economy and increasing the diversity of activities helps to shift the focus from alcohol and make places safer. A30.4 supports preparation of a community safety plan.</p>	
Change	Source	
P30 principle amended to clarify that locations will be addressed, not just activities, in efforts to support diverse late night attractions (e.g. night markets, parks and public spaces)	NSLHD, Community	
P30 principle added to P30 to foster a diverse live music culture consistent with the Arts and Creativity Strategy	Community	
A30.1 amended to update the preparation of a night-time economy strategy from a long term to a short term action.	Community	
A30.1 amended by removing reference to the community safety plan in contributing to the night-time economy strategy due to this being a separate process.	Council	
A30.4 amended to clarify the community safety plan will not just address Manly. Partners were added to include NSW Police; Northern Beaches Liquor Accord; Liquor Gaming and Racing; Community Safety Committee.	Community	