

**Macroplan's feedback on Council's planning report on the Planning Proposal:**

- 1) The Northern Beaches Local Housing Strategy (LHS), endorsed by Council in April 2021 is inconsistent with the Greater Sydney Region Plan, Northern Beaches District Plan and Northern Beaches Local Strategic Planning Statement for the reasons outlined below. It should be noted that the LHS has not been endorsed / approved by the Department of Planning, Industry and Environment.
- 2) The primary basis for Council rejecting the Planning Proposal is based on the 800m Centre Investigation Area (CIA) boundary of the LHS which uses the B-line bus stop as the centre point (modified in the revised LHS). This is inconsistent with the LHS vision statement i.e. *"New housing will be focused in and near centres where people can easily access public transport or walk or cycle to shops and services"* and the LHS CIA Framework which states that the CIA boundary is defined as areas within 800m of centres and public transport, not within 800m of a B-line bus stops. Macroplan is of the opinion that the Planning Proposal is consistent with the CIA Framework (i.e. a Mixed housing precinct suitable for housing such as townhouses and small scale apartments of 2-4 storeys) however, it is not consistent with the boundary line drawn by Council in the revised LHS.
- 3) The residential development yield anticipated under the concept design will result in a minor increase in traffic movements and will not result in the need for any additional investment in road infrastructure or works. Based on Council's LSPS, Mona Vale, as a strategic centre, has adequate community and social infrastructure which can be easily accessed by future residents.
- 4) Council has not considered the context of the locality and suitability of the site to achieve the strategic directions and outcomes of the existing strategic planning framework (e.g. Region Plan, District Plan and LSPS). The Planning Proposal aligns with the end intentions articulated in these strategic planning documents.
- 5) Macroplan is of the opinion that the lengthy timeframes proposed to undertake amendments to the LEP to deliver new housing in Mona Vale will compromise the achievement of both the LSPS and LHS vision(s) for future housing supply and housing diversity and will therefore continue to put upward pressure on housing supply and affordability.

**Site context:**

The site already adjoins medium density development; comprises amalgamated allotments; and is located at the end of a cul-de-sac road which is less than 350m in length from the Pittwater Road signalised intersection. The site is located less than (walking distance):

- 700m from the Mona Vale commercial / retail core;
- less than 300m from Mona Vale's employment lands; and
- less than 400m from public transport options with the closest bus stop located on Pittwater Road.

As the crow flies, the site is located approximately 830m from the B-line bus stop on Barrenjoey Rd, just outside the revised CIA boundary of the LHS (April 2021 version). The centre point previously adopted for the LHS CIA was in the centre of Mona Vale's retail and commercial core and the subject site was well within the exhibited CIA.

**Strategic alignment of the Planning Proposal – Mona Vale as a Strategic Centre:**

Under the Greater Sydney Region Plan, metropolitan and strategic centres are identified as a focus for jobs growth and industry investment. It states that Strategic centres are becoming increasingly important parts of the region's structure as both a place for employment but also to live. Mona Vale is identified as a strategic centre and therefore is the closest centre to the subject site. Council's 'new' interpretation of the LHS's CIA framework to focus on providing medium and higher density housing in close proximity to a high frequency bus stop, which takes commuters into Sydney CBD and out of Mona Vale, is inconsistent with supporting the growth of Mona Vale as a Strategic Centre. The employment generating capacity of this strategic centre is tied in with the population that surrounds it.

Actions within the North District Plan relate to the ongoing development and growth of the commercial and retail function of Mona Vale. Allowing the population to grow through density will help to support this outcome with more people requiring more service providers. Action 45 of the Plan (p77), relates to strengthening Mona Vale as a strategic centre by protecting and nurturing its retail and commercial core. Developing local employment growth will need to be supported by improved housing options to accommodate a variety of additional workers.

Furthermore, to achieve the 30 minute city long term aspiration, the North District Plan notes that more housing, jobs, health and education facilities will need to be planned in metropolitan and strategic centres such as Mona Vale so that more people can access public transport, metropolitan and strategic centres. This is also important from a liveability, productivity and sustainability perspective. The Planning Proposal will provide additional housing opportunities within

walking distance of Mona Vale strategic centre as well as public transport options which provide connectivity within the Northern Beaches and to Sydney's CBD. Council's new interpretation of the LHS is to encourage residents to leave Mona Vale for employment and services via the B-line rather than supporting the growth of Mona Vale as a strategic centre.

The LSPS states Mona Vale is characterised by its local coastal character with a village atmosphere however, in the future it is identified as developing into a cosmopolitan coastal local character and being the urban heart of the northern peninsula. It is also identified as needing to provide additional housing choice and being an employment hub with a focus on additional jobs being provided closer to home. The LSPS acknowledges that opportunities exist for new housing to be provided near the Mona Vale centre (p120), not a B-line bus stop. The subject site is located less than 400m from the employment lands and strategic centre of Mona Vale.

#### **Housing targets:**

Housing targets should not be deliberately interpreted or used around the notion that they are a maximum topping up figure for new housing when in fact, they are a minimum performance expectation relevant to this metropolitan plan. If there can be earlier and practical materialisation of new housing such as medium density, it should not be unnecessarily held up on the basis of housing targets being achieved. The Economic Assessment and Justification Report (Appendix H of the Planning Proposal) outlines the consequences and impacts of additional housing supply not being provided in the Northern Beaches and specifically Mona Vale. The provision of additional housing supply in locations such as Frenchs Forest does not address the housing issues in Mona Vale which includes a lack of medium density housing and different apartment sizes.

#### **Lack of housing diversity:**

Approximately 56% of the LGA's dwellings (i.e. approximately 101,500) are detached dwellings with the provision of detached dwellings the greatest around Frenchs Forest and Mona Vale. Council has acknowledged that housing affordability is a major issue for the LGA with additional housing supply needed to address affordability issues and to provide a greater choice of housing options to a changing and ageing community, while also meeting housing targets. The LSPS specifically states that *"significant additional housing supply is not needed to address projected population growth, but is needed to address affordability issues and to provide a greater choice of housing options to a changing and ageing community"* (p128). Hence the LHS is required to not only achieve housing targets in Mona Vale but also provide housing supply to address housing diversity. The Planning Proposal aims to address housing diversity issues.

#### **Implications of retaining Clause 4.5A of Pittwater Local Environmental Plan 2014 (PLEP 2014):**

The implications of continuing to implement clause 4.5A of the PLEP 2014 to housing developments in the northern part of the LGA was not addressed in the *Northern Beaches Local Housing Strategy* (April 2021). This clause does not apply to the remaining part of the LGA. This clause in effect limits the number of dwellings which can be built on a site, which in most instances would not change the building footprint or scale of a medium density residential development. That is, visually the FSR and height controls determine the building footprint and scale of the development while clause 4.5A influences whether the development site has a mixture of one, two and three bedroom apartments or is dominated by three plus bedroom apartments. Hence under the proposed concept development, and subject to the site being rezoned R3 Medium Density Residential, visually the development would present the same whether there was 30 or 41 apartments within the development envelope based on the height and FSR remaining unchanged.

Specifically, Objective 10 of the Greater Sydney Region Plan notes that providing housing supply and a range of housing types in the right locations will create more liveable neighbourhoods and support Greater Sydney's growing population. The Plan states (p68-69):

*"Factors that contribute to rental and purchasing affordability challenges include the limited availability of smaller dwellings to meet the growing proportion of small households as well as the growing distance between areas where housing is affordable and the location of employment and education opportunities... A diversity of housing types, sizes and price points can help improve affordability."*

This Planning Proposal seeks to remove its applicability from this site because of its implications to addressing housing affordability and diversity issues. No planning justification has been provided by Council to justify why this clause should continue to apply in the former Pittwater LGA of the Northern Beaches LGA. Removing the applicability of clause 4.5A to development carried out on the site will facilitate the land being developed for medium density housing including different dwelling sizes and price points.