

The Chair
Northern Beaches Planning Panel
Northern Beaches Council
PO Box 82
Manly NSW 1655

23 November 2022

Response to Supplementary Memo to the Local Planning Panel meeting of 16th November 2022 and further submissions.

Dear Chair and Panel Members,

We refer to the Panels deferral of its consideration of Agenda Item 4.1 - 10-12 Boondah Road, Warriewood-Planning Proposal at the meeting held 16th November 2022.

We and our Client have previously emailed Council staff and the Panel requesting that the consideration of the Planning Proposal (PP) by the Panel be deferred until a comprehensive report is before the Panel that has properly considered all of the material lodged in support of the rezoning request. This is particularly relevant to the amendment to the Planning Proposal (PP) request submitted in October 2022.

We note that a Supplementary Memo (“Memo”) was provided to the Panel by Council staff on 14 November 2022 and that the matter was subsequently deferred at the meeting by the Panel for seven days to allow a reasonable time for the applicant to respond to the Memo and make further written submissions.

We remain of the view that the Memo and assessment report does not consider the fundamental aspects of the PP as amended in October 2022 and as a result the Council staff assessment and conclusion that the PP lacks strategic merit and site-specific merit remains flawed and without proper basis.

We also submit that contrary to the conclusions in the assessment report and Memo that the PP does have strategic and site-specific merit and the relatively modest new housing supply it contemplates is badly needed especially given a recent and dramatic increase in the shortfall of projected dwellings in the Northern Beaches LGA due to the decision not to proceed with the Ingleside Place Strategy which was identified in Council’s Housing Strategy as a major contributor to Councils housing delivery targets.

The land the subject of the PP before the Panel was previously the subject of a rezoning review by the Sydney North Planning Panel who released their decision dated 8 September 2020.

That review by the Sydney North Planning Panel found that the PP as then proposed should not proceed.

The fundamental concern raised in the decision not to recommend that the previous Planning Proposal proceed to Gateway was that there was not an appropriate balance between the provision of housing in the right locations and the provision of active open space.

The concern was because at the time of the review decision in September 2020 Council's policy position was to pursue voluntary acquisition on the subject and other private land within the Warriewood Valley buffer area for open space. The Sydney North Planning Panel in their concluding remarks noted that the opportunity to revisit this balance may be appropriate if Council was to exhibit and complete housing and recreational land reviews to which a new proposal would give effect.

This outcome has come to pass, and Council no longer maintains a policy position to voluntarily pursue land acquisition within the Warriewood Valley buffer area of the subject and other private land and Council has adopted a Local Housing Strategy.

The current PP has also addressed the matters which the Sydney North Planning Panel identified to be undertaken relating to:

- Flood planning;
- Coastal management;
- Avoidance of direct biodiversity impacts;
- Site contamination; and
- Building form and density.

The major issues raised in the recommendation before the Panel on the current PP relate to flood evacuation and safety, flood management and biodiversity impacts.

A summary response to these primary issues is provided below. We raise concerns that the assessment report is incorrect in fundamental areas and this position has flowed through to the recommendations made. This is despite the assertion in the Memo page 3 Item 5 that "There has been no omission or error" in the assessment report. We also note that the Memo itself has provided no assessment or comment on the October C2 Environmental Conservation zone boundary amendment to the PP or the additional technical information provided specifically regarding flood engineering and biodiversity which included:

- The email from Mr Maurici dated 17 October 2022, amending the PP,
- The Travers ecological letter dated 12 October 2022.
- The Calibre memorandum dated 14 October 2022.

The Memo essentially seems to assert that these items were all considered at the time of the assessment, despite none of the items above being specifically mentioned, listed or discussed at all in the original assessment report.

In regard to the reasons for refusal in the assessment report the following observations are made:

(A) Flood Evacuation and Safety

The assessment report at pages 5 (Reason A), 18 and 24 identifies that shelter in place is not an acceptable strategy to manage risk, clearly inferring that this is the flood risk management approach adopted in the PP.

The proposal does not rely upon shelter in place.

As clearly set out in the Calibre memo of 16 September 2022, which specifically addressed the matters raised in the SES referral response, the location of the proposed dwellings is to be raised to 1% AEP plus climate change plus a freeboard i.e. the Flood Planning Level. A flood free evacuation route at the 1%AEP

plus climate change is proposed and supported by recent survey data. The memo notes that shelter in place is also available – but is not the only option, as well as the provision of flood sensors for early warning to residents to identify evacuation options without reliance upon the SES.

The criticism that the proposal relies upon shelter in place is incorrect and misrepresented in the assessment report and the assessment completely omits to mention that the PP relies upon DCP compliant strategy of an evacuation path above the 1%AEP plus climate change level. Further the SES response, if any, to the clarifying memo has not been provided to us and it is not clear if the SES concerns have now been satisfied.

(B) Flood Management

The recommendation presented and the assessment report is critical that there is a net loss of flood storage and significant adverse impacts to other properties.

The Pittwater 21 DCP at section C6.1 actually states that a water management report is to demonstrate no net decrease in flood storage volumes and/or no additional adverse impacts to other properties.

The assessment report in error identifies on page 22 that “*The controls require*” that both scenarios are to be complied with, yet the plain wording of the DCP and the interpretation provided to the applicant’s flood engineer from Council’s engineering staff confirmed that compliance with either scenario was required to be achieved to satisfy the relevant flood planning provisions.

The framing of the assessment is in error. The Calibre consulting memo of 14 October 2022 confirmed compliance with acceptable flood impacts to other properties in all scenarios except in the 1%AEP event where a 25mm increase in water levels was modelled in a non-habitable area of the Warriewood Valley. The memo and original Water Management Report also identified a strategy that if implemented would be able to reduce this potential impact to water levels that would be suitable to avoid categorisation of impacts as being adverse impacts which was advised by Council flood engineers as being afflux less than 20mm

The assessment completely omits to address the Calibre memorandum of 14 October 2022 and that the PP has demonstrated “no adverse impacts to other properties” based on afflux flood modelling as specified by Council engineering staff. The October 2022 memo from Calibre also contains other important information on water quality treatment strategy, groundwater measurements and preliminary impact assessment, Narrabeen Lagoon floodplain characteristics and overland flows to Warriewood Wetlands that has also been omitted from the assessment.

(C) Flood Planning

While Clause 5.21 of the PLEP 2014 is a matter to be addressed when determining a development application, as set out above the proposal is supported by a technical analysis of flood risk and management options to address the requirements of Council’s applicable assessment regime detailed in the DCP and thus satisfaction of clause 5.21 of the PLEP would be able to be demonstrated.

(D) Biodiversity Impacts

The PP does not propose to result in the removal of any mapped Coastal Wetland vegetation despite the assessment stating that there is Coastal Wetland within the proposed R3 Medium Density Residential zone and that the application includes development works in the C2 Environmental Conservation zone and mapped Coastal Wetland areas, and that Wetland Vegetation will necessarily be removed (pages 15, 21, 22, 26 and 29 of the assessment report).

The amendment to the Planning Proposal by email from Mr Maurici of 17 October 2022 and Travers letter dated 12 October 2022 clearly stated that the C2 Environmental Conservation zone boundary would be

adjusted such that this proposed zone would include all of the mapped wetland on the Coastal Wetlands and Littoral Rainforest map.

None of this mapped sensitive land would be included in the proposed R3 Medium Density Residential zone boundary.

The amended PP request also identifies options to increase the area of Bangalay Sand Forest through tree and understorey planting on the site, including within the required APZ areas as allowed by RFS guidelines.

The landscape buffer between the proposed development and the wetlands has been confirmed as being able to be managed as an APZ such that canopies do not touch or overhang buildings and would have a canopy cover not exceeding 15%.

Further targeted fauna surveys were undertaken to underpin and confirm the conclusions of avoidance of unacceptable impacts in the biodiversity assessment.

The assessment of the separate Biodiversity Certification Application by Environment and Heritage remains ongoing.

The fundamental basis of the proposed management of flooding and biodiversity impacts has not been clearly conveyed in the assessment report and should not form the basis of the Panels deliberation on the matter.

The Panel should have before it an assessment report on the PP as amended and this assessment should form the basis of any advice the Panel may provide to Council on the merits of the PP request.

(E) Affordable Housing

As a relatively modest potential dwelling yield, the PP is supported by an offer from the applicant to construct and have managed by a registered housing provider, four dwellings as affordable rental housing for a ten (10) year period.

(F) Height

The Council's memo identifies that there is no mechanism to limit the height such that a two storey plus attic form is ensured to be achieved. The 15.0m Height of Buildings development standard was identified to account for the reality that the land form will be required to be raised to accommodate the building platforms. As height is to be measured from ground level existing then this margin was suggested to be factored in. However to respond to the concern raised, as the flood planning design level will be established through the PP process, an alternate approach could be to impose a maximum RL to AHD for buildings on the land. The RL would be set based upon the flood planning level plus 9.5m.

The Standard Template includes provision for such an approach to be included in LEP. This approach could be pursued as a map amendment or the nomination of the appropriate RL in the Part 6 Urban Release Area s provisions of Pittwater LEP 2014.

(G) Acquisition obligations

Any land zoned C2 Environmental Conservation would only trigger acquisition if included in the land acquisition map, which is not proposed. The ongoing ownership of this land would remain with a future development of the land either as part of common property or as part of a community title scheme.

(H) Strategic and Site Specific merit

The PP as amended has demonstrated:

- Opportunities to enhance and protect bushland and biodiversity
- Accommodation of Climate Change impacts
- Management of flood and bushfire hazards
- Management of water quality
- Contribution towards affordable housing
- Provision of additional housing supply in the right location that is well served by public transport and urban services

Housing Delivery in the Northern Beaches

When the Department of Planning and Environment approved Council's Local Housing Strategy (LHS) via letter to the CEO on 16 December 2021, **it was a strictly conditional approval**, subject to requirements and advised that, "any planning proposal for new housing development will be assessed against the Northern Beaches Council LHS, the requirements above and the advisory notes attached". A copy of the Department's letter is attached to this submission.

The approval of the LHS by the Department required at item 5 that if the Ingleside dwelling yields were not realised, the Council should urgently and by December 2022, proceed with compensatory rezonings **including consideration** of LHS identified Housing Diversity Areas, of which Warriewood is one and/or other rezonings in the LGA that have arisen since the preparation of the LHS that will enable delivery of substantive new housing supply. Given the decision to not proceed with the Ingleside Place Strategy we are of the opinion that the PP request is consistent with the circumstances outlined by the Department.

The specified Department conditions and deadlines highlight the real world urgency of securing housing supply. The assessment report for this PP does not identify any alternate proposals that have been submitted for Gateway Determination in response to the decision not to proceed with the Ingleside Place Strategy and omits to mention the directly relevant and conditional approval of the LHS by the Department.

To the contrary, this PP is in response to and contributes to the satisfaction of the short term need to secure new housing supply which has now been exacerbated by the decision not to proceed with the Ingleside Place Strategy and the identified under delivery of dwelling targets in the Warriewood Valley Land Release (of which this site forms part).

Notwithstanding Council's assessment and the Memo, the PP has clearly demonstrated sufficient strategic and site specific merit to warrant progression for the proposal to Gateway Determination.

Should you require any further information to the above, please do not hesitate to contact me on (02) 9380 9911 or by email at sbarwick@sjb.com.au.

Yours Sincerely,



Scott Barwick
Director

Enclosure:



Mr Ray Brownlee
General Manager
Northern Beaches Council
PO Box 82
MANLY NSW 1655

Dear Mr Brownlee

Northern Beaches Local Housing Strategy

Thank you for submitting Northern Beaches Council's Local Housing Strategy (LHS) to the Department for the Secretary's approval.

The Department commends Council on preparing a robust evidence base to support its LHS, providing Council with a clear understanding of the current and future housing needs of the Northern Beaches local government area.

I can confirm that I have determined to approve the Northern Beaches LHS, adopted April 2021. My decision reflects the analysis undertaken to develop a comprehensive strategic planning framework and the evidence base to inform your LHS and deliver 3,500 dwellings for the period 2021-26. This assessment has also considered the additional information provided by council following our meeting in August.

In doing so, I have determined that:

- The LHS addresses housing supply, including the 6-10 year housing target, although commitment to further actions for delivery are required.
- The LHS addresses the need for housing diversity, although commitment to further actions for delivery are required.
- The LHS addresses housing affordability.
- The LHS is generally consistent with Section 9.1 Directions and SEPPs.
- The LHS is consistent with the North District Plan, subject to the requirements identified below.

The approval is also subject to the following requirements:

1. Within six (6) months of Council being notified of the LHS approval, Council is to prepare an updated and prioritised Implementation and Delivery Plan that clearly articulates the actions, roles and responsibilities and timing to facilitate housing supply, diversity and affordability between 2021 and 2026,

and beyond. The Plan should be prepared in consultation with the Department, Transport for NSW (TfSNW), Sydney Water and adjoining Councils, to ensure any interdependencies are satisfactorily identified.

2. Council is to expedite the following LHS actions under Priorities 2 and 5 to ensure housing supply, diversity and affordability outcomes are secured before 2026:
 - Planning analysis and LEP updates for Brookvale, Dee Why, Mona Vale, Manly Vale and Narrabeen that do not reduce the permissibility or density of existing permissible uses.
 - Annual reporting of development by centre to track yields and housing mix.
 - Adoption of a social and affordable housing target.
 - Continue to implement council's affordable housing contribution scheme (AHCS).
 - Review and seek lower parking requirements for boarding houses for R3, R4 and B4 sites in centre investigation areas.
3. Planning proposal(s) for two or more of the Centre Investigations Area are to be submitted to the Department for Gateway determination by December 2022 to facilitate dwelling delivery within the 2021 to 2026 period. These planning proposals are to be considered necessary to support the delivery of additional housing over the short to medium term, which will help council to meet its 6-10 year housing targets. These projects also present opportunities for new housing typologies (including affordable housing) suited to the future and changing needs of the community.
4. Council is to continue to progress and finalise the master planning and rezoning of Ingleside Precinct and include this as part of its proposed Comprehensive LEP to give rise to opportunities for housing to support council achieving its 6-10 year housing targets. Council is to prepare and submit this planning proposal to the Department for Gateway determination by December 2022.
5. Alternatively to requirement No. 4 (or if only part of expected dwelling yield for the Ingleside precinct is able to be realised as exhibited for the precinct by the Department in 2021), Council should proceed with planning work that will lead to rezoning of one or more of the following as outlined in its LHS to compensate for housing not delivered by the Ingleside precinct:
 - One of the of the following Centre Investigation Areas for Brookvale, Dee Why, Manly Vale or Narrabeen (this is not already committed under requirement No. 3 above);
 - Two or more of the Housing Diversity Areas centres; and/ or
 - other proposed rezonings in the LGA that have arisen since the preparation of the LHS that will enable delivery of substantive and new housing supply.

The planning proposals for one or more of these alternatives are to be submitted to the Department for Gateway determination by or before December 2022.

6. Any planning proposal(s) seeking to prohibit dual occupancy and/or medium density development where these forms of housing are currently permitted under any existing LEP is generally not supported, and would need to comprehensively address impacts to housing supply (including meeting the GSC's 6-10 year target), potential loss of housing choice and diversity, and justify any inconsistencies with Section 9.1 Ministerial Direction 3.1 – Residential Zones.
7. To ensure affordable housing is achieved within the 6-10 year period, Council is to continue to implement its AHCS in accordance with the Department's Guidelines.
8. A locally specific medium density complying development model as an alternative to the Low Rise Medium Density Housing Code is not supported. Council is to consult with the Department's Planning System Policy division to discuss alternative options to achieve the desired objectives of this approach.
9. A locally specific model for seniors housing as an alternative to the new Housing SEPP is not supported. Council is to review the new Housing SEPP and its changes to the previous approaches under the former Seniors Housing SEPP and consult with the Department's Planning System Policy division to discuss alternative options to achieve the desired objectives of this approach.
10. A locally specific model for affordable rental housing as an alternative to the new Housing SEPP is not supported. Council is to review the new Housing SEPP and its changes to the previous approaches under the former Affordable Housing SEPP, and is to consult with the Department's Planning System Policy division to discuss any alternative options to achieve the desired objectives of this approach.
11. Future iterations of the LHS should outline a clear commitment on the timing and process for reviews and updates of the LHS.
12. The direction and strategic planning approaches endorsed in any State-led strategies or plans are to prevail in the event of any inconsistency with this approval and/or the Council's LHS (as revised and current).
13. Update or revise the LHS to inform Council's updates/revision to its LSPS following the making of a future District Plan.

Any planning proposals for new housing development will be assessed against Northern Beaches Council's LHS, the requirements above and Advisory notes attached.

Implementing your Local Housing Strategy

The State Government is committed to reducing the time taken to complete planning proposals that support housing delivery by tailoring the steps in the process to the complexity of the proposal, and by providing clear and publicly available justification for each plan at an early stage.

To meet these commitments, a detailed implementation plan is required. This should reflect a comprehensive work program for all strategic planning work Council commits to undertake to implement its LHS and should include but not be limited to work streams related to items identified in the LHS Actions.

Local Housing Strategy Reviews and Updates

We strongly recommend that Council review and revise (where required) its LHS before the LSPS is required to be reviewed by the GSC. This will help best inform the next update to the LSPS.

It will also provide Council with the opportunity to improve and clarify aspects of the LHS. The advisory notes provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure in the absence of the Department's LHS review process.

Once again, I would like to take this opportunity to acknowledge the significant amount of work your team has been undertaken to develop the LHS. Please be advised that the LHS will be published on the NSW ePlanning Portal alongside this letter of approval and advisory notes.

Should you have any further questions, please contact Dominic Stefan, Specialist Planner on 8275 1024.

Yours sincerely



Amanda Harvey **16 December 2021**
Executive Director
Local Strategies and Plan Making

Encl: Advisory Notes



Northern Beaches Council Local Housing Strategy

Advisory Notes

The following advisory notes identify the further work Council will need to undertake to strongly position future planning proposals and further iterations of the Local Housing Strategy (LHS). The advisory notes provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals (where relevant) and that these will be reinforced through Gateway determinations as an interim measure in the absence of the LHS review process.

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Supporting Approval Requirements	
Affordable Housing Contribution Scheme (AHCS)	<p>Council’s LHS evidence-base is considered sufficient to justify the preparation of a SEPP70 AHCS. A condition of approval of the LHS is included which requires Council to prepare a scheme that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management.</p> <p>Action 18 of the North District Plan requires Council to prepare an AHCS. The scheme would be prepared in advance of any out-of-sequence planning proposals and sends a critical signal to the market regarding Council’s strategic planning intentions with regard to affordable housing provision. It will also commit Council to examining the feasibility of affordable housing contributions for all new proposals that are likely to result in an uplift of land value. If feasible and appropriate, affordable housing contributions would be required by LEP provisions that implement the contributions scheme.</p> <p>The scheme should be prepared in accordance with the Greater Sydney Region Plan key parameters for successful implementation of Affordable Rental Housing Targets and the NSW Government’s <i>Guideline for Developing an Affordable Housing Contribution Scheme</i>.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Ongoing Implementation	<p>Future iterations of the LHS should be underpinned by an implementation plan with a priority work program, clearly defined roles, responsibilities and definitive timeframes with risks and dependencies identified. The Plan should be prepared in consultation with the Department and Transport for NSW (TfNSW) to ensure any critical interdependencies are satisfactorily resolved. This is encouraged to be informed by resourcing and budgets to demonstrate how housing targets will be delivered.</p> <p>The updated implementation plan prepared by Council and required to be shared with the Department should specifically address:</p> <ul style="list-style-type: none"> • Council’s work in relation to significant infrastructure, investment and transformation projects, including: <ul style="list-style-type: none"> ○ Centre Investigation Areas (CIAs) for Brookvale, Dee Why, Manly Vale and Narrabeen ○ Housing Diversity Areas (HDAs) for local centres ○ The French Forest Education and Health Precinct ○ The Ingleside Precinct • Council’s work in relation to housing diversity. • The preparation of a place-based and/or centres-based planning program that investigates opportunities and constraints in the LGA, identifying areas where greater uplift or changes to planning controls may be feasibly delivered. • The preparation/progression of the Consolidated LEP planning proposal to implement a single LEP for the Northern Beaches LGA.
Review and monitoring framework	<p>Revisions to the LHS may be required in response to significant changes in the LGA such as announcements on new infrastructure investment and employment opportunities, significant changes in projected population growth or updates to the LSPS.</p> <p>The framework should also review the supply and delivery of housing, including the 6-10 year housing target and targets for medium density and seniors housing.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
For inclusion in future iterations of the LHS	
Infrastructure	<p>Future iterations of the LHS should detail the key local and State infrastructure commitments and investment decisions that will support the unlocking of housing supply. This analysis should consider public and active transport, education and health facilities, open space, community infrastructure, drinking supply, wastewater and utility services. Council is encouraged to cross reference any endorsed Council strategies and plans, where relevant, and collaborate with the Department and other State agencies (and in particular Schools Infrastructure NSW (SINSW), Sydney Water and TfNSW) to ensure identified opportunities are realistic and accurately reflect staging, sequencing, servicing and delivery of critical infrastructure such as public transport, education facilities and drinking supply and waste water services. Thresholds/triggers, funding, responsibilities for delivery and indicative timeframes should also be identified.</p>
Making appropriate provision for any additional housing opportunities that may arise out of sequence	<p>The inclusion of a transparent and robust framework to consider additional opportunities assists Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit.</p> <p>Council is encouraged to utilise its out-of-sequence criteria in its LSPS to consider such proposals, and consider the following heads of consideration:</p> <ul style="list-style-type: none"> • Strategic merit and case for change • Robust demographic evidence • Housing Affordability and Diversity • Demand analysis and economic impacts • Infrastructure delivery and funding to be borne by the proponent • Stakeholder consultation and outcomes • Sustainability and resilience
Review and monitoring framework	<p>Revisions to the LHS may be required in response to significant changes in the LGA such as announcements on new infrastructure investment and employment opportunities, significant changes in projected population growth or updates to the LSPS.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<p>The implementation of a monitoring and review system and establishment of housing targets for medium-density and seniors housing to determine whether future changes to the LEP and/or DCP are required to incentivise or encourage housing diversity and diversity of housing typologies, including any necessary changes to the Northern Beaches LEP (once gazetted) and in response to the new Housing Diversity SEPP. The framework should also review the supply and delivery of housing, including the 6-10 year housing target.</p>
<p>Community and Stakeholder Engagement</p>	<p>Incorporate the findings of any future relevant community and stakeholder engagement.</p>
<p>Consultation and engagement with agencies</p>	<p>Council should continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW in relation to <ul style="list-style-type: none"> ○ planning for city-shaping & city-serving transport initiatives in Future Transport 2056 and alignment with Council-led transport infrastructure initiatives, ○ future transport infrastructure including the Western Harbour Tunnel and Beaches Link, ○ future B-Lines along Warringah and Mona Vale Roads, and ○ travel demand management measures and improvements to walking and cycling infrastructure to reduce dependence of current and future residents on private vehicle use. • Sydney Water • SINSW: <ul style="list-style-type: none"> ○ prior to the finalisation of any future strategy or planning proposal that proposes a significant increase in the number of dwellings; and ○ when Council is aware of variations in the following: <ul style="list-style-type: none"> - The actual number of lots or dwellings varying from planning proposal estimates / strategic plans. - An emerging demographic that varies from the planned population profile, either with more or less families with children. - Rates of development and dwelling take-up varying from planned release programs or forecast residential take-up rates.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	This is to ensure SINSW specifically understands where growth, or changes to growth rates are occurring and can effectively respond by targeting appropriate resourcing to impacted Government schools.
Seniors housing	Council is encouraged to investigate the inclusion of seniors housing provisions in its LEP that encourages increased supply of housing for seniors and people with a disability.
Interdependencies with relevant local evidence base	<p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS, including but not limited to:</p> <ul style="list-style-type: none"> • Northern Beaches Affordable Housing Strategy • Review of LEP and DCP controls which restrict the development of smaller, diverse and fit-for-purpose housing, • Sydney Water Growth Servicing Plan 2020-2025 (recently updated), and <p>The Frenchs Forest Structure Plan once finalised.</p>
Structure Plan	Future iterations of the LHS should include a structure plan(s) that clearly identifies housing growth areas/precincts and their anticipated delivery over the short, medium and longer term horizons. Annotations to identify likely yield ranges and any key threshold assumptions should also be included.
Data	
Clarification of 6-10 year target and 10-20 year housing forecast.	<p>Revisions to the LHS should provide a breakdown of how the 6-10 year target will be achieved, including when and where anticipated supply will be delivered and explain market take-up rates. LHS revisions will also need to include a revised housing delivery forecast for the 10-20 year period as new information becomes available.</p> <p>Council should ensure that all population and dwelling forecasts are cross-checked against published Department projections to provide greater transparency. Additional guidance and support can be arranged with the Department's Evidence and Insights team to resolve any discrepancies in dwelling forecasts</p>