

12 December 2023

Ms Louise McMahon
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Agile Planning
NSW Department of Planning & Environment
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Our Ref: 2023/795214

Dear Ms McMahon

Planning Proposal (PP-2021-7404) 159-167 Darley Street West, Mona Vale

Thank you for the opportunity to make a submission on the Planning Proposal for 159-167 Darley Street West, Mona Vale, on exhibition until 1 November 2023. Noting Council lodged a draft submission on 1 December 2023, and was granted an extension on lodging the final submission.

The attached submission calls on the Sydney North Strategic Planning Panel to reject the Planning Proposal as it is considered to be inconsistent with the Greater Sydney Region Plan, North District Plan, Northern Beaches Local Strategic Planning Statement - Towards 2040, Northern Beaches Local Housing Strategy, has not demonstrated sufficient strategic or site specific merit, will set and unwanted precedent.

Should you require any further information or assistance in this matter, please contact my office on (02) 8495-6415.

Yours Faithfully



Louise Kerr
Director Planning & Place



northern
beaches
council

Northern Beaches Council Submission

159-167 Darley Street West, Mona Vale

December 2023

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EXECUTIVE SUMMARY

Northern Beaches Council welcomes the opportunity to provide a submission to the Planning Proposal for 159-167 Darley Street West, Mona Vale by Intrec Management (the Proponent) in the Northern Beaches Local Government Area (LGA).

This submission calls on the Sydney North Strategic Planning Panel to reject the Planning Proposal as it is inconsistent with the Greater Sydney Region Plan, North District Plan, Northern Beaches Local Strategic Planning Statement - Towards 2040, Northern Beaches Local Housing Strategy, has not demonstrated sufficient strategic merit and will set an unwanted precedent.

Summary of Issues

- **No draft LEP amendments provided** – The Planning Proposal fails to provide draft LEP clauses and a new LEP affordable housing contributions scheme map for the proposed amendments, nor detail how the existing minimum lot size requirement for the site will be addressed.
- **Alignment with Strategic Plans** – The Planning Proposal does not demonstrate strategic merit and is inconsistent with key aspects of the Greater Sydney Region Plan, North District Plan, Northern Beaches Local Strategic Planning Statement - Towards 2040 and Northern Beaches Local Housing Strategy.
- **Flooding** – The proposal is inconsistent with Local Planning Direction 4.1 – Flooding in that:
 - It permits additional development in floodway areas
 - It substantially increases by over 300% the dwelling density in the Flood Planning Area
 - It has not been demonstrated that the increase of the probable maximum flood on 155 Darley Street can be mitigated.
- **Affordable Housing** – The Planning Proposal incorrectly implies that the 5% contribution rate for affordable housing is for new residential floorspace, not for the entire site (total gross floor area of the development) as required by the gateway condition. The Planning Proposal also incorrectly implies the final affordable housing contribution rate should be subject to viability testing. Again, this is inconsistent with the Gateway conditions.
- **Insufficient Justification** - The proposal does not adequately justify the rezoning of the subject property over and before other land adjoining the site or within the Mona Vale town centre zoned R2 or other land across the LGA with similar characteristics and attributes.
- **Precedent** - Consideration of rezoning of the subject site, outside of the Mona Vale Place Planning process has the risk of setting a precedent for adjoining landowners, or other landowners of R2 zoned land to consider rezoning under the same premises.
- **Traffic** - concerns with potential impact on operation of the signalised intersection of Darley Street West and Pittwater Road. More recent traffic data and intersection

modelling would be required to support any subsequent development applications to gauge the impact on Darley Road West queue lengths and delay. Additional lane capacity at Darley Street West needs to also be considered to address increased generation and demand attributed to any proposed development.

- **Biodiversity** - the preliminary ecology assessment has concluded that 0.13ha of native vegetation is to be impacted. Council recommends, that a Flora & Fauna Assessment is submitted as part of a future DA, including more detailed site survey, assessment and reporting.

INTRODUCTION

Subject site

The land comprises five lots in total (See *Figure 1*), legally described as Lot 1-5, DP 11108 with an approximate area of 6,120m². The site contains five single or two storey dwellings, and adjoins:

- A residential flat building to the East containing 11 units (155 Darley Street West),
- Darley Street West and Bayview Golf Course to the North,
- Detached dwellings and a residential flat building containing four units (10 Kunari Place) to the West; and
- A mix of one and two storey detached dwellings located in Park Street to the South.



Figure 1 : Aerial photo of site and adjoining properties

Background

A Planning Proposal (PEX 2021/0001) for properties at 159-167 Darley Street West, Mona

Vale was lodged on 14 July 2021 by Intrec Management (the Proponent).

The proposal was to:

- Rezone properties 159-167 Darley Street West, Mona Vale from R2 Low Density Residential under PLEP 2014 to R3 Medium Density Residential.
- Amend Clause 4.5A(3) of PLEP 2014 to include reference to 159-167 Darley Street West, Mona Vale (thereby confirming that clause 4.5A does not apply to the subject site).

The original exhibition of the Planning Proposal by Council in August 2021 resulted in 72 public submissions with 66 submissions objecting to the proposal. One submission generally supported the proposal, with a further submission being neutral and four submissions raising no objection to the rezoning but objecting to the proposed removal of the density restrictions.

On 26 October 2021, Council resolved to reject the Planning Proposal, and not forward it to the NSW Department of Planning, Industry and Environment (the Department) for a Gateway determination for the following reasons:

- A. The Planning Proposal is inconsistent with the provisions of the North District Plan.
- B. The Planning Proposal is inconsistent with the provisions of Council's Local Strategic Planning Statement - Towards 2040.
- C. The Planning Proposal does not demonstrate strategic merit or site-specific merit when assessed against the NSW Planning & Environment's: A guide to preparing planning proposals.
- D. The Planning Proposal may establish an unwanted precedent.
- E. The Planning Proposal does not provide affordable housing in keeping with the requirements of Council's Affordable Housing Policy.

Council also resolved that as part of the Mona Vale Place Planning Process, include 159-167 Darley Street West, Mona Vale for consideration within the Centre Investigation Area (as identified within the draft Local Housing Strategy) and the appropriateness of clause 4.5A of the Pittwater LEP 2014 for the locality be reviewed as part of the Place Planning process.

Strategic Planning Panel of the Sydney North Planning Panel – Rezoning Review

The Proponent subsequently sought a "Rezoning Review" of the proposal by the Sydney North Planning Panel (the Panel), which would determine whether the Planning Proposal should proceed to a Gateway Determination, based on its assessment of the strategic and site-specific merits of the proposal.

On 18 February 2022, Council provided a response to the Rezoning Review which reiterated the reasoning for Council's decision, including failure to demonstrate satisfactory strategic and site-specific merit, and inconsistency with the strategic planning framework, including Council's Local Strategic Planning Statement - Towards 2040 (LSPS) and endorsed Local Housing Strategy (LHS).

At its meeting of 13 April 2022, the Panel heard the matter and on 19 April 2022 determined that additional information was required from Council in relation to the status of the Mona Vale Place Plan, and from the Proponent in relation to further consideration of affordable housing provision having regard to Council's Affordable Housing Policy and State Environmental Planning Policy (Housing) 2021.

On 27 April 2022, Council advised that it would not be able to provide any updates on the Mona Vale Place Plan prior to Council's consideration of the matter and following public exhibition.

On 11 July 2022 Council was notified that the Panel would proceed to determine the matter at its meeting on 7 September 2022.

On 28 July 2022, Council asked the Panel Secretariat whether the Proponent had provided further submissions on affordable housing as requested by the Panel and whether Council could view those submissions. Council did not receive a response to that request.

On 6 September 2022 (the day before the Rezoning Review panel meeting), following a further enquiry by Council about submissions, Council was provided the Proponent's submission to the Panel (dated 30 May 2022) regarding affordable housing, including a feasibility analysis prepared by Macroplan consulting. The Proponent also provided a draft letter of offer for a voluntary planning agreement to provide an affordable housing contribution of 3.3% of the additional floorspace equating to \$1,476,000.

Council subsequently formally sought to have the Panel meeting deferred to allow appropriate time to review this information. This request was denied.

On 7 September 2022 the Panel undertook the pre-determination meeting. Council attended and re-iterated its previous submissions that the proposal was inconsistent with broader strategic directions contained in relevant regional and local planning policies, including Council's approved Local Housing Strategy.

On 13 September 2022 Council wrote to the Department reiterating it had not had sufficient time to respond to the Proponent's additional submission and asserting that the Proponent's submission was erroneous in law, and inconsistent with Council Policy and current LEP provisions. No response was received.

On 14 September 2022 Council was notified that the Panel had unanimously resolved that the Planning Proposal demonstrated strategic merit and site-specific merit and should be submitted for a Gateway determination (Attachment 2).

The Panel further considered:

"the proposal's strategic merit included being consistent with the relevant District Plan, LSPS and LHS and notably the provision of affordable housing. Further, in respect of both strategic and site-specific merit, the Panel noted that, not only is the remainder of Darley St West zoned R3 but that it is also development consistent with that zone. The only remaining lots not so zoned or developed form the subject site. The Panel also noted that its site-specific merit included satisfaction of flooding constraints. It resolved that prior to proceeding to Gateway Determination the Proponent should work with the Department and Council to resolve an appropriate Affordable Housing mix consistent with the North District Plan and address any flooding constraints of the site."

The Proponent did not provide additional information about the provision of affordable housing following the Panel determination, nor did it engage in any further discussions with Council. It was subsequently agreed with the Department that Council would appoint consultants to provide advice on the Proponent's affordable housing feasibility analysis.

Affordable Housing Contribution

During the Rezoning Review process, the Proponent provided a draft letter of offer for a planning agreement providing an affordable housing contribution of 3.3% of the additional floorspace equating to \$1,476,000.

On 20 December 2022, Council, at the request of the Department, engaged a consultant to undertake a review of the Proponent's proposed affordable housing contribution.

During the review process the Proponent revised its offer of an affordable housing contribution down to 2.085% of the additional floorspace or up to \$1,122,627.

Council's review concluded that an affordable housing contribution of 6.4% of the additional floorspace (equivalent to 5% of the total gross floor area of any development) is feasible for this site based on a rate of \$18,272/m² of gross floor area. This would equate to a contribution of \$3,374,872 based on the Proponent's concept plans.

Planning Proposal Authority Role

Council was invited to be the Planning Proposal Authority (PPA) for this proposal, which it accepted on 25 October 2022.

Council prepared a draft Planning Proposal for submission to the Minister for Planning for a Gateway Determination which includes a proposal to introduce an affordable housing clause and map in PLEP 2014 and to provide an affordable housing contribution of 5% of the total gross floor area of any development on this site.

Council at its meeting of 18 April 23 however did not adopt the recommendation to submit the planning proposal to the Minister for Planning for a Gateway Determination.

On 20 June 2023, Council was notified by the Department that as the delegate of the Minister for Planning and Public Spaces in accordance with section 3.32 of the *Environmental Planning and Assessment Act 1979* (the Act) to appoint the Panel as the Planning Proposal Authority (PPA) for the Planning Proposal.

On 17 August 2023, the Panel determined that the Planning Proposal should be submitted to the Department for Gateway assessment on the condition that, as part of the gateway determination, the Planning Proposal be updated to:

- Include an affordable housing contribution rate of 5% which is to be mapped and included in the Affordable Housing clause in the Pittwater LEP 2014
- Address the most recent version of Ministerial direction 4.1 flooding
- Address the most recent versions of all Ministerial directions and State Environmental Planning Policies; and
- Reflect the current status of the Mona Vale Place Plan review

Gateway Determination

On 8th September 2023, the Department issued a Gateway determination for the Planning Proposal (PP- 2021-7404) under section 3.34(2) of the Act, determining that:

an amendment to the Pittwater Local Environmental Plan 2014 to rezone 159-167 Darley Street West, Mona Vale from R2 Low Density Residential to R3 Medium Density Residential should proceed subject to the following conditions...

The conditions include:

- Prior to community consultation, updating the Planning Proposal to:
 - assess the proposal against up-to-date SEPPs and Ministerial 9.1 Directions;
 - consider the proposal against the Mona Vale Place Plan, having regard to its current status;

- include a new Affordable Housing clause in the PLEP with associated Affordable Housing Contributions Scheme Map, consistent with clause 6.11 (Affordable Housing) of the Warringah LEP 2011 and
- identify an affordable housing contribution rate of 5% for the site on the proposed Affordable Housing Contributions Scheme Map.
- Public exhibition is required for a minimum of 20 working days
- Undertaking consultation with public authorities and government agencies.
- Completing the LEP on or before 17 July 2024.

Public Exhibition

On 1 November 2023, the Department advised Council that a Planning Proposal for the property at 159 Darley Street, Mona Vale (PP- 2021-7404) would be on public exhibition from Friday, 3 November 2023 until Friday, 1 December 2023.

Planning Proposal

The proposal seeks to:

- Rezone properties 159-167 Darley Street West, Mona Vale from R2 Low Density Residential under Pittwater Local Environmental (PLEP) 2014 to R3 Medium Density Residential.
- Amend Clause 4.5A(3) of PLEP 2014 to include reference to 159-167 Darley Street West, Mona Vale (thereby confirming that clause 4.5A does not apply to the subject site).
- Amend PLEP 2014 to include an Affordable Housing Contributions Scheme Map for 159-167 Darley Street West, Mona Vale, generally in accordance with the proposed affordable housing contribution scheme map.

A Concept Plan has also been prepared for the site showing two apartment buildings comprising 38 apartments plus three townhouses, equating to 41 dwellings.

However, it is noted that the Concept Plan carries no statutory weight and should the Planning Proposal be approved in its current form, a development application would be required for the site, which could be of a substantially different form and density to the submitted Concept Plan.

Proposed amendments to Pittwater LEP 2014

The following amendments to PLEP 2014 are proposed:

- A. Amending the PLEP 2014 zoning map to rezone the site from R2 Low Density Residential (see Figure 2) to R3 Medium Density Residential (see Figure 3)

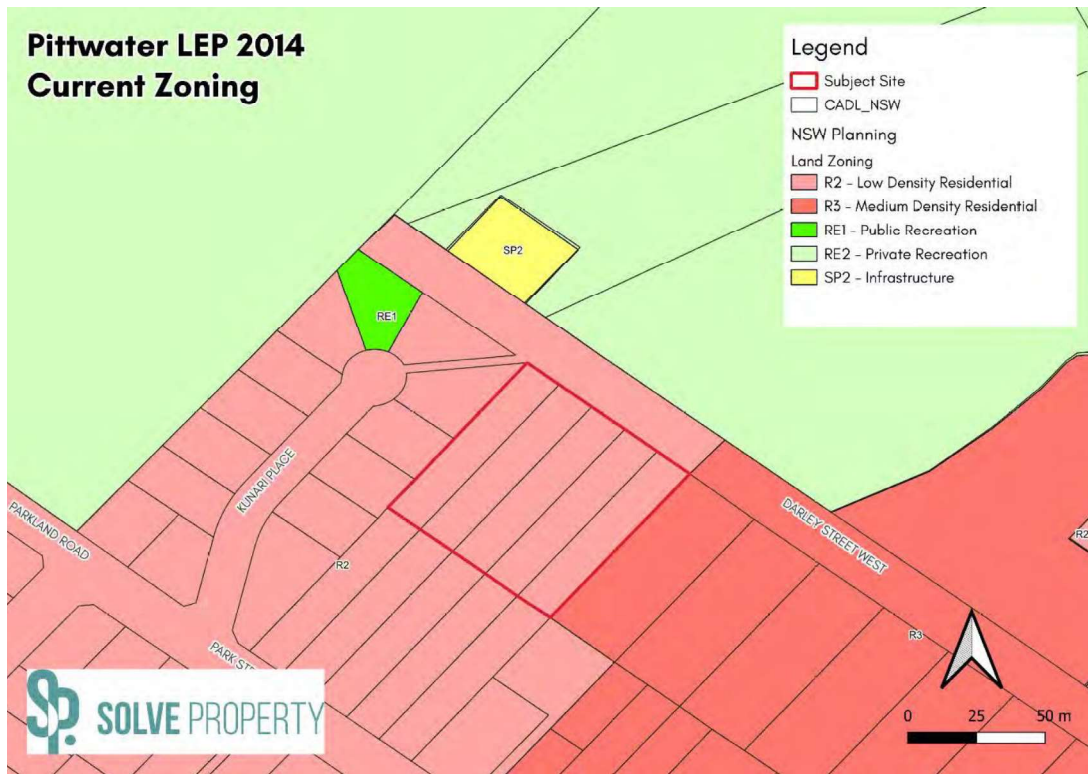


Figure 2 - Existing zoning

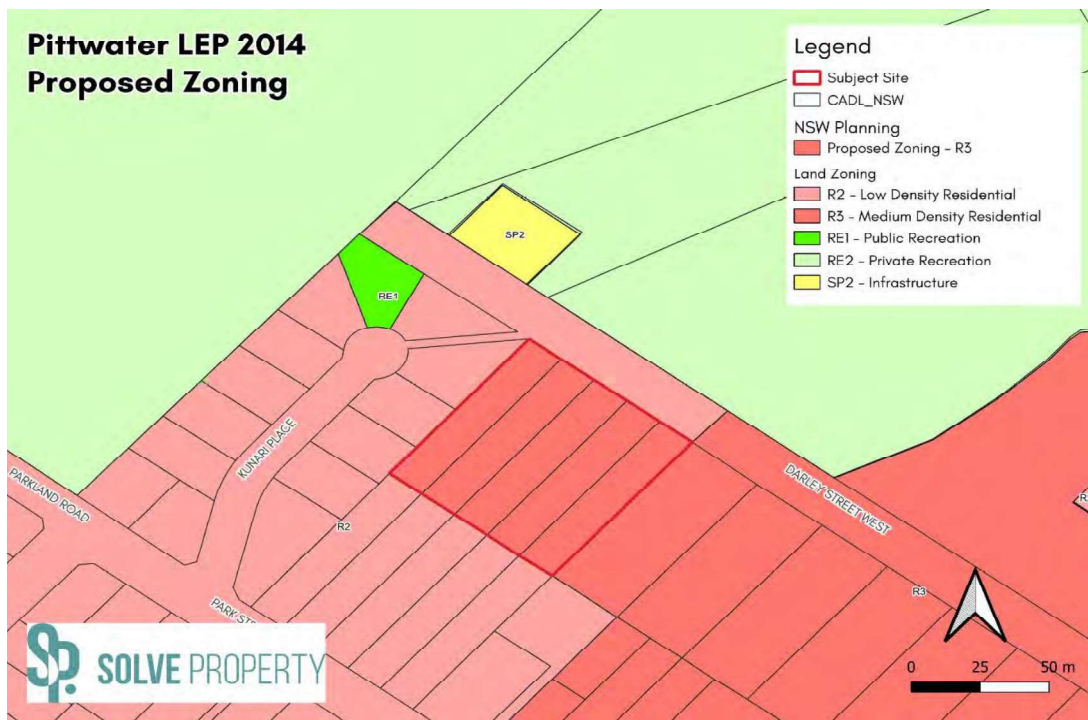


Figure 3 - Site - Proposed Zoning

- B. Amend Clause 4.5A(3) of PLEP 2014 to include reference to 159-167 Darley Street West, Mona Vale (thereby confirming that clause 4.5A does not apply to the subject site)

It is noted however that no draft amendment for clause 4.5A(3) of PLEP 2014 has been provided in the Planning Proposal to indicate how it would no longer apply to the subject site.

The Planning Proposal should be amended to include the draft LEP clause, as Council requires the draft clause to review so it can provide comment.

- C. Amending PLEP 2014 to include an Affordable Housing Contributions Scheme Map for 159-167 Darley Street West, Mona Vale, generally in accordance with the proposed affordable housing contribution scheme map (see Figure 4).

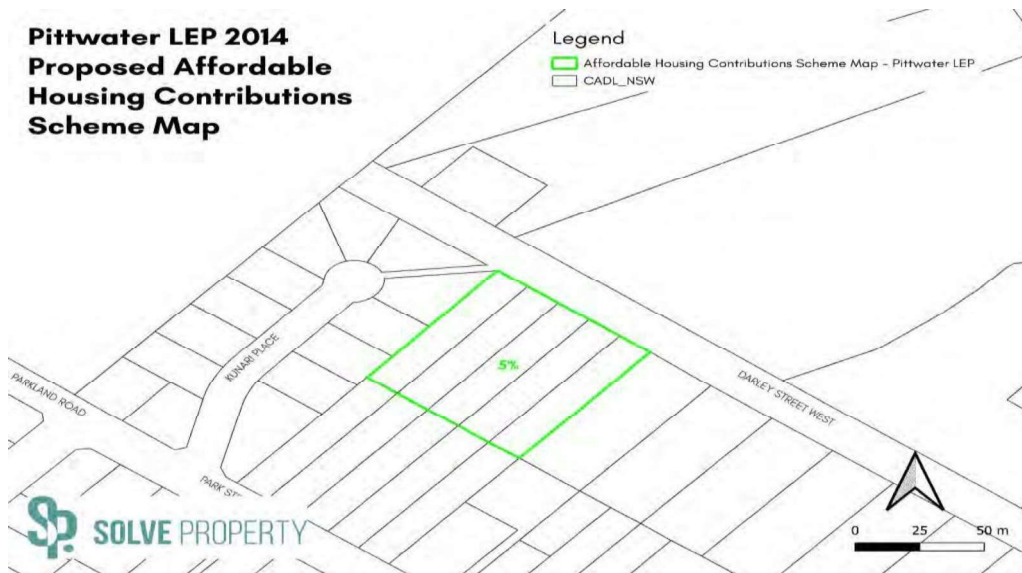


Figure 4 - Proposed Affordable Housing Scheme Map

It is noted however that:

1. a new affordable housing contributions scheme map for PLEP 2014 has not been provided in the Planning Proposal identifying the site to which the affordable housing contributions scheme applies (the figure provided is not an LEP map)
2. no draft clause to amend PLEP 2014 Part 7 additional local provisions to include an affordable housing contribution provision for the purposes of affordable housing has been included in the Planning Proposal, consistent with clause 6.11 of WLEP 2011.

The Planning Proposal should be amended to include the PLEP clause and draft affordable housing contributions scheme PLEP map as Council requires these to review so it can provide comment.

Also, it is noted that the site is currently subject to a 700m² minimum lot size subdivision requirement in the PLEP 2014. The PLEP doesn't have a minimum lot size requirement for land zoned R3. The Planning Proposal should be amended to remove the minimum lot size for subdivision requirement.

DISCUSSION OF KEY ISSUES

A discussion of the key issues is provided below

Strategic Merit - Relationship to Strategic Planning Framework

1. Greater Sydney Regional Plan and North District Plan

The Planning Proposal is inconsistent with the Greater Sydney Regional Plan and North District Plan

Mona Vale is identified as a Strategic Centre within both the *Greater Sydney Region Plan 2036* (GSRP) and the *North District Plan* (NDP). In these documents, strategic centres are the focus of housing, employment, and transportation. As per the NDP, Mona Vale strategic centre is a mixed-use area including retail, commercial, community, light industrial and residential uses.

In both the GSRP and NDP, the focus for this centre is in its commercial and retail function including a job target of between 700-1700 jobs by 2036. A 0–5-year housing target of 3,400 dwellings is also provided in the NDP, with each Council to also develop 6-10 housing targets through its LHS and demonstrate capacity for steady housing supply.

The Northern Beaches Council's Local Strategic Planning Statement- Towards 2040 (LSPS) was made by the Chief Executive Officer under delegated authority based on Council's resolution 25 February 2020 and a letter of support from the Greater Sydney Commission (GSC) for consistency with the GSRP and NDP. This planning document sets out a 20-year vision for land use in the area.

Councils LSPS (see section 2) and LHS (see section 3) is the mechanism to provide a locally relevant response to the GSRP and NDP housing targets. The LSPS identifies the need to prepare a LHS and a Place Plan for Mona Vale.

The NDP, LSPS and LHS do not specifically require the need for additional housing in the location of the subject site. Further the Proponent has not demonstrated why this planning proposal should be progressed ahead of the Mona Vale Place Plan and without the demonstrable strategic need for additional housing of this form in this location.

It is therefore considered that the Proposal does not have strategic merit.

Greater Sydney Region Plan – A Metropolis of Three Cities

The proposal's consistency with the relevant objectives of the GSRP is detailed within Table 1.

Relevant Planning Priorities	Consistency
Housing the City Objective 10 – Greater housing supply	<p>The Proposal is inconsistent with Objective 10 of the GSRP which seeks to deliver “greater housing supply” because the site is not in the right location for additional medium density housing such as residential flat buildings, which needs to be planned for with consideration of the broader character of the area and impacts on infrastructure to support any proposed growth.</p> <p>The proposal will support residential uses on the site; however, the objective is to support new housing in the right location and must be coordinated with</p>

	<p>local infrastructure.</p> <p>As identified in section 3, Council's LHS identifies an area within 800 metres of the Mona Vale centre as an area for future investigation. This is subject to separate precinct-based master-planning and community consultation work, being done via the Mona Vale Place Plan.</p> <p>Any increase in density in the R3 zone under the LEP should be considered holistically in the context of the proposed precinct-based review being undertaken by Council in the Mona Vale Centre Investigation Area.</p>
<p>Objective 11 – Housing is more diverse and affordable</p>	<p>The Proposal is not consistent with Objective 11 of the Greater Sydney Region Plan.</p> <p>The objective is to provide diverse housing choices, particularly in the form of additional affordable rental housing.</p> <p>Council's affordable housing policy requires areas of urban renewal (areas of zoning uplift) to provide 10% affordable rental housing.</p> <p>This is reinforced through Council's LSPS, which contains several principles and actions in relation to social and affordable housing, including seeking a minimum of 10 per cent affordable rental housing to be included in new planning proposals.</p> <p>See section 4 for a discussion on affordable housing.</p> <p>Whilst the Planning Proposal includes a figure identifying an affordable housing contribution rate of 5% for the site to be on the proposed Affordable Housing Contributions Scheme Map, no draft LEP map or clause is provided. The Planning Proposal further stipulates that the 5% rate is for new residential floorspace (not 5% of the total GFA for the site), and that the final contribution should be subject to viability testing.</p> <p>Both of these assertions are incorrect and inconsistent with the Panel's recommendation and gateway conditions and therefore objective 11.</p> <p>The gateway condition is for the Planning Proposal to identify an affordable housing contribution rate of 5% for the site on the proposed Affordable Housing Contribution Scheme Map. This is 5% of the total GFA for the site (not just the uplift component), to be introduced via an LEP map and clause.</p> <p>Additionally, as detailed in the feasibility analysis commissioned by Council, at the request of the Department, the provision of 5% of total GFA of the development has already been determined to be the feasible affordable housing contribution rate for the Planning Proposal.</p>
<p>A well-connected city</p> <p>Objective 14 - Integrated land use and transport creates walkable and 30-minute cities</p>	<p>The Proposal is not consistent with Objective 14 of the Greater Sydney Region Plan, that is "Integrated land use and transport creates walkable and 30- minute cities" and Council's LHS as the Proposal is located outside the Centre Investigation Area for Mona Vale and will also result in a significant increase in the number of dwellings on the site.</p> <p>To achieve a 30-minute city the integration of land use and transport planning is required to create walkable cities</p> <p>As identified in section 3, Council's adopted position within its LHS for exploring additional housing diversity within Mona Vale, is the identification</p>

	<p>of a Centre Investigation Area within an 800-metre radius of the Mona Vale B-line bus stop. This area has been identified as the most appropriate location within a walkable distance to services, jobs, and public transport.</p> <p>The Planning Proposal to change the zoning and alter the density to significantly increase the number of dwellings on this site is inconsistent with Council's adopted LHS and considered inconsistent with Objective 14.</p>
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Table 1 : Consistency with relevant priorities in the Greater Sydney Region Plan

North District Plan

The proposals consistency with the relevant objectives of the *North District Plan* is detailed within Table 2.

Relevant Planning Priorities	Consistency
Housing the city Planning Priority N5 – Providing housing supply, choice, and affordability, with access to jobs, services, and public transport	<p>The Proposal is not consistent with Planning Priority N5.</p> <p>The NDP does not specifically require additional housing in the location of the subject site. The mechanism to provide a locally relevant response to the NDP is Council's LSPS and LHS, the latter of which was approved by the Department on 16 December 2021 (see section 3).</p> <p>The objective of Planning Priority 5 is to support new diverse housing (such as terrace and villa homes that provide increased housing options) in the right location and must be coordinated with local infrastructure.</p> <p>The Proponent has not demonstrated why this Planning Proposal should be progressed ahead of the Mona Vale Place Plan and without the demonstrable strategic need for additional housing of this form and in this location.</p> <p>Further, the proposal does not adequately justify the rezoning of the subject property over and before other land adjoining the Mona Vale town centre zoned R2, or other land across the LGA with similar characteristics and attributes. Rezoning of the subject site ahead of the Mona Vale Place Plan would set a precedent for adjoining and other landowners to pursue rezoning outside of an agreed and approved strategic process.</p> <p>Priority N5 identifies that councils are in the best position to investigate and confirm which parts of their local government area are suited to additional medium density opportunities (particularly for infill development) through the preparation of local housing strategies.</p> <p>Priority N5 also sets five-year housing targets for the Northern Beaches area and stipulates that each council is to develop 6-10 housing targets through its LHS and demonstrate capacity for steady housing supply.</p> <p>Council's approved LHS identifies that Council generally has capacity under existing planning rules to provide for these new homes. However, Council needs to provide for a diversity of dwelling types to meet demand (see section 3 for detail on the LHS, centre investigation areas and Mona Vale Place Plan).</p> <p>Priority N5 also identifies the requirement for councils to prepare Affordable Rental Housing Target Schemes following development of implementation arrangements.</p> <p>In addition to Council's LSPS & LHS a key element of Council's Affordable</p>

	<p>Housing Policy is the inclusion of the Northern Beaches LGA in State Environmental Planning Policy No.70 (SEPP70). SEPP 70 enables Councils to include affordable rental housing requirements in Local Environmental Plans (LEPs) in areas subject to zoning “uplift” through an affordable housing contribution scheme.</p> <p>Council has an affordable housing contribution scheme, which will allow the collection of developer contributions to provide affordable housing either as complete dwellings or as an equivalent monetary contribution. The scheme applies to the Frenchs Forest Planned Precinct and a site subject to a rezoning proposal in Narrabeen. It will be extended to other land that is subject to increases in residential density in the future.</p> <p>Whilst the Planning Planning includes a figure identifying an affordable housing contribution rate of 5% for the site on the proposed Affordable Housing Contributions Scheme Map, no draft LEP map or clause is provided. The Planning Proposal further stipulates that the 5% rate is for new residential floorspace (not 5% of the total GFA), and that the final contribution should be subject to viability testing.</p> <p>Both assertions are incorrect and inconsistent with the Panel’s recommendation and gateway conditions and therefore objective 11.</p> <p>The gateway condition is for a rate of 5% of the site be identified in an Affordable Housing Contribution Scheme Map. This is 5% of the total GFA (not just the uplift component).</p> <p>Additionally, as detailed in the feasibility analysis commissioned by Council, at the request of the Department, the provision of 5% of total GFA has already been determined to be the feasible affordable housing contribution rate for the Planning Proposal.</p>
Planning Priority N10	<p>The Proposal is not consistent with Planning Priority N10.</p> <p>Council’s LSPS recognises Mona Vale as the contemporary, urban heart of the northern peninsula. Actions for this strategic centre focus on place planning and revitalisation of the commercial centre as well as improvements to circulation and transportation both within the centre and in terms of access to other areas of the LGA.</p> <p>The LSPS indicates that other studies will inform how Council is able to achieve housing, employment, and infrastructure targets into the future.</p> <p>There is no clear link between the Northern Beaches LSPS and the provision of additional housing beyond the existing Mona Vale strategic centre. As detailed in section 3, this is being investigated through work on the Mona Vale Place Plan (which has commenced) and will consider the development potential of that area.</p>
A well-connected city	<p>The Proposal is not consistent with Planning Priority N12.</p>
Planning Priority N12 – Delivering integrated land use and transport planning and a 30-minute city	<p>To achieve a 30-minute city the integration of land use and transport planning is required to create walkable cities.</p> <p>Councils adopted position within its LHS for exploring additional housing diversity within Mona Vale, is the identification of a Centre Investigation Area within an 800- metre radius of the Mona Vale B-line bus stop (see section 3). This area has been identified as the most appropriate location</p>

	<p>within a walkable distance to services, jobs and public transport.</p> <p>The Planning Proposal to change the zoning and alter the density to significantly increase the number of dwellings on the site is inconsistent with Council's adopted LHS and considered inconsistent with Planning Priority N12.</p>
<p>A resilient city</p> <p>Planning Priority N22 - Adapting to the impacts of urban and natural hazards and climate change</p>	<p>Effective planning can reduce exposure to natural and urban hazards, with growth and change to be considered at the local level, taking into consideration cumulative impacts.</p> <p>The site is identified as flood affected, with the Planning Proposal showing general compliance with planning on flood affected land. A full assessment however cannot be undertaken until a more detailed application is lodged.</p>

Table 2 : Consistency with relevant priorities in the North District Plan

It is therefore considered the proposal does not have strategic merit.

2. Alignment With Towards 2040

The planning proposal is inconsistent with the provisions of Councils Local Strategic Planning Statement, Towards 2040.

The Planning Proposal is not the result of any endorsed LSPS, strategic study or report.

Whilst Councils LSPS identifies an area of 1.5 km around the Mona Vale centre to investigate medium density housing, a key principle is also to locate a greater diversity of housing and affordable housing options within reasonable walking distance (800m) of high-frequency public transport. The mechanism to further explore the location, demand and type of dwelling is Councils LHS and preparation of the Mona Vale Place Plan.

The objective of the Planning Proposal is to provide additional medium density housing within the vicinity of the Mona Vale town centre via a spot rezoning. Spot rezonings are not the best means of achieving the intended outcomes of providing a mix and diversity of housing to meet the needs of the local community whilst considering the unique character and impacts on infrastructure to support any proposed growth.

The proposal also does not adequately justify the rezoning of the subject property over and before other land adjoining it or within the broader Mona Vale town centre zone R2 land (or other land across LGA with similar characteristics and attributes). Rezoning the subject site would set a precedent for adjoining and other landowners to seek rezoning before the Mona Place plan is completed.

Councils LSPS contains four priorities related to housing as shown in Table 3.

Relevant Planning Priorities	Comment
<p><u>Open Space</u></p> <p>Priority 6 - High quality open space for recreation</p>	<p>A key principle is to locate all new residential development within 400m of open space and all high-density areas within 200m of open space.</p> <p>The site is opposite the Bayview Golf Course, and within 200m of additional areas zoned RE1.</p>

<p><u>Housing</u> Priority 15 – Housing supply, choice, and affordability in the right locations</p>	<p>A key principle is to locate a greater diversity of housing and affordable housing options within reasonable walking distance (800m) of high-frequency public transport.</p> <p>Action 15.1 of the LSPS is for Council to prepare and implement a LHS. The endorsed LHS does not consider the site for medium density housing.</p> <p>The Proposal is not within 800 metres of the B-line stop, or the area for investigation as identified within the LHS (see Section 3). However, as per the Council resolution of 26 October 2021, the subject site has been included in the development of the Draft Mona Vale Place Plan, and Council are investigating ways to control density, including the appropriateness of the current site area per dwelling clause 4.5A of the Pittwater LEP 2014.</p> <p>The approach of having a defined centre investigation area allows for a range of housing types, with a lower density overall, that can be designed in keeping with neighbourhood character yet build on local assets and features and account for constraints. It enables a broader approach to how a centre might function in terms of aspects such as walking and cycling access or integrated planning for open space and other neighbourhood amenities.</p>
<p>Priority 16 – Access to quality social housing and affordable housing</p>	<p>To ensure an available supply of affordable rental housing and provide for a minimum of 10% affordable rental housing for all Planning Proposals for upzoning.</p> <p>See section 4 for a discussion on affordable housing.</p> <p>Whilst the Planning Proposal includes a figure identifying an affordable housing contribution rate of 5% for the site on the proposed Affordable Housing Contributions Scheme Map, no draft clause is provided. The Planning Proposal further stipulates that the 5% rate is for new residential floorspace (not 5% of the total GFA), and that the final contribution should be subject to viability testing.</p> <p>Both assertions are incorrect and inconsistent with the Panel's recommendation and gateway conditions and therefore objective 11.</p> <p>The gateway condition is for a rate of 5% of the site be identified in an Affordable Housing Contribution Scheme Map. This is 5% of the total GFA (not just the uplift component).</p> <p>Additionally, as detailed in the feasibility analysis commissioned by Council, at the request of the Department, the provision of 5% of total GFA has already been determined to be the feasible affordable housing contribution rate for the Planning Proposal.</p>

<p><u>Jobs and skills</u></p> <p>Priority 27 – Prepare a place plan for Mona Vale and develop LEP and DCP controls to respond to LEP studies and support the revitalisation of the centre.</p>	<p>Action 27.1 of the LSPS is for Council to prepare a place plan for Mona Vale and develop LEP and DCP controls to respond to LEP studies and support the revitalisation of the centre.</p> <p>The LSPS recognises Mona Vale as the contemporary, urban heart of the north. Actions for this strategic centre focus on place planning and revitalisation of the commercial centre as well as improvements to circulation and transportation both within the centre and in terms of access to other areas of the LGA.</p> <p>The LSPS indicates that other studies will inform how Council is able to achieve housing, employment, and other infrastructure targets into the future.</p> <p>There is no clear link between the Northern Beaches LSPS and the provision of additional housing beyond the existing Mona Vale strategic centre. As per the Council resolution of 26 October 2021, the subject site has been included in the development of the Draft Mona Vale Place Plan, and Council are investing ways to control density, including the appropriateness of the current site area per dwelling clause 4.5A of the Pittwater LEP 2014.</p>
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Table 3 : Consistency with Towards 2040

Council's LSPS is the mechanism to provide a locally relevant response to the GSRP and NDP.

It is therefore considered the Proposal does not have site specific or strategic merit.

3. Alignment With Council Local Housing Strategy

The proposal is inconsistent with the provisions of Council's Local Housing Strategy

Council's LHS was approved by the Department on 16 December 2021, consistent with the GSRP, NDP and LSPS. It guides planning for a diversity of housing within the Northern Beaches LGA for the next 20 years and builds on the designation of strategic, local and village centres identified in the LHS.

The LHS applies the principles of Towards 2040 and aims to build in long term capacity for growth around centres with good transport, whilst respecting each centre's scale and character and increasing housing diversity and affordability. The LHS is the most appropriate mechanism to broaden (where required) the choice of building types and locations available in the housing market in the Northern Beaches today, and the kind of housing that will be needed in the future.

It considers trends in terms of population growth and change; household size and mix; issues such as affordability, sustainability and building resilience; and housing diversity, including housing types such as boarding houses, seniors housing and social and affordable housing.

The LHS identifies that we will need to accommodate around 12,000 new homes by 2036 to provide for population growth. The shortfall between what is needed and what is currently proposed for development is less than 300 dwellings.

The approved LHS has identified that there is sufficient capacity to accommodate future housing demand in and around centres in existing urban areas without the need to make

major changes to our existing planning controls for most of the Council area.

The Planning Proposal incorrectly states that Council is more than 2000 houses behind the housing targets set by the GCC.

It is acknowledged by the Department that the 2016 to 2021 housing completions data outlined in the Department dashboard is incomplete. The data does not count completions data for secondary dwellings, seniors housing developments, and boarding house rooms constructed in the Northern Beaches. In the period 2016-2021, 841 secondary dwellings, 259 seniors living units, and 268 boarding house rooms were completed on the Northern Beaches. Together with the 2318 other completed “homes” identified in the dashboard, this equates to 3686 new dwellings – meeting the 5-year dwelling target of 3,400.

Council's LHS also includes a dwelling target for the years 2021-2026 of 3,582 dwellings. As identified in Council's LHS Implementation and Delivery Plan submitted to the Department on 4 July 2022, this target will be achieved through the projects detailed within the LHS Implementation and Delivery Plan, being the new Northern Beaches Local Environmental Plan, Frenchs Forest Structure Plan, Brookvale Structure Plan and Mona Vale Place Plan.

Ad hoc Planning Proposals such as the subject site, undermine Council's strategic planning framework, infrastructure planning and potentially the success of planned centres.

It is noted also that the population projections included in the LHS were based on population projections from 2019, which did not account for impacts of Covid-19. Recent Population projections released in June 2022 by DPE indicate that the population projections for the Northern Beaches to 2036 have decreased by close to 2,900 people.

Northern Beaches LGA	2016	2021	2026	2031	2036	2041
Population projections 2019	265,450	269,600	275,250	281,800	288,450	296,650
Population projections 2022	265,468	274,015	276,063	280,440	285,591	289,529
Difference	18	4,415	813	-1,360	-2,859	-7,121

Table 6: DPE Northern Beaches population projections

Most recent figures from the ABS (April 2023) also show an estimated residential population of 263,090 people in 2022 for the Northern Beaches. Significantly lower than the projected population that informed the housing supply targets.

Irrespective of this, Council also needs to provide for a diversity of dwelling types to meet local needs. To achieve this goal, the LHS outlines the following options:

- Housing diversity areas (HDAs) that will permit seniors housing, boarding houses and dual occupancies within 400m of identified local centres including Avalon Beach, Newport, Warriewood, Belrose and Freshwater.
- Centre investigation areas (CIAs) that will be subject to detailed planning to consider a broader range of housing types within 800m of Brookvale, Dee Why, Mona Vale, Manly Vale and Narrabeen, and in Forestville and Beacon Hill subject to the future B-Line route.

The approach of having a defined CIA allows for a range of housing types, with a lower density overall, that can be designed in keeping with neighbourhood character yet build on local assets and features and account for constraints. It enables a broader approach to how a centre might function in terms of aspects such as walking and cycling access or integrated planning for open space and other neighbourhood amenities.

Planning for infrastructure to support proposed growth will be a key element of this work, and

will consider potential impacts on local infrastructure, including transport, traffic, environmental sustainability, and climate change.

The adopted position for exploring additional housing diversity within Mona Vale, is the identification of a Centre Investigation Area within an 800-metre radius of the Mona Vale B-line bus stop. This work is a separate precinct-based place-planning process involving community consultation. The Proposal is both outside of the Mona Vale investigation area and is inconsistent with the intent of master-planning, which is to consider the area, reflect on the unique character of the area and circumstances and impacts on infrastructure to support any proposed growth.

The Northern Beaches Local Planning Panel (LPP) also did not agree that the site is suitable for medium density development. The LPP considered that the application was premature considering the strategic planning initiatives being undertaken, and recommended the site be included in the Mona Vale Centre Investigation Area. Whilst the subject site has several lots zoned R3 Medium Density to the east, most of the surrounding area contains low density housing and is zoned R2 low density residential.

As per the Council resolution of 26 October 2021, the subject site has been included in the development of the Draft Mona Vale Place Plan, and Council are investigating ways to control density, including the appropriateness of the current site area per dwelling clause 4.5A of the Pittwater LEP 2014 and impacts on local infrastructure.

In consideration of the above, the documents submitted by the proponent have not demonstrated why this Planning Proposal should be progressed ahead of the completion of the Mona Vale Place Plan. The proposal is inconsistent with the intent of master-planning, which is to consider the area, reflecting upon the unique character of the area and potential infrastructure required to support any growth.

Further, the proposal does not adequately justify the rezoning of the subject property over and before other land adjoining the Mona Vale town centre zone R2 land (or other land across LGA with similar characteristics and attributes). Consideration of rezoning of the subject site has the risk of setting a precedent for adjoining landowners to consider rezoning under the same premise (see section 6).

Any increase in density in the R3 zone under the LEP should also be considered holistically in the context of the proposed precinct-based review being undertaken by Council in the Mona Vale Centre Investigation Area.

The best and most orderly way to explore and outline Council's approach to managing the location, type, and amount of new housing to meet the needs of the Northern Beaches community to 2036 is therefore through Council's LHS and Place Planning of the Mona Vale area. The conditions placed on the LHS approval also do not change the fundamental proposals for Centre investigation Areas or their location.

It is therefore considered the Proposal does not have site specific or strategic merit.

4. Affordable Housing

The Planning Proposal incorrectly states that the affordable housing contribution rate of 5% is to be applied to the new residential floor space (not the total gross floor area of the development) and that the final contribution should be subject to viability testing

Council's LHS identifies a significant undersupply of affordable housing on the Northern Beaches to support key and essential workers, and through Council's adopted Affordable Housing Policy aims for the provision of 10% affordable rental housing in areas subject to urban renewal (areas of zoning uplift).

This is reinforced through Council's LSPS, which contains several principles and actions in relation to social and affordable housing, including seeking a minimum of 10 per cent affordable rental housing to be included in new Planning Proposals, consistent with Council's existing Affordable Housing Policy.

The Gateway determination includes two conditions in relation to Affordable Housing, in that prior to community consultation the Planning Proposal is to be updated to:

- include a new Affordable Housing clause in the PLEP with associated Affordable Housing Contributions Scheme Map, consistent with clause 6.11 (Affordable Housing) of the Warringah LEP 2011
- identify an affordable housing contribution rate of 5% for the site on the proposed Affordable Housing Contributions Scheme Map.

Whilst the Planning Proposal includes a figure identifying an affordable housing contribution rate of 5% for the site on the proposed Affordable Housing Contributions Scheme Map, no draft LEP map or clause is provided. The Planning Proposal further stipulates that the 5% rate is for new residential floorspace (not 5% of the total GFA for the site), and that the final contribution should be subject to viability testing.

Both assertions are incorrect and inconsistent with the Panel's recommendation and gateway conditions.

The gateway condition is for a rate of 5% of the site be identified in an Affordable Housing Contribution Scheme Map. This is 5% of the total GFA of any development (not just the uplift component).

Additionally, as detailed in the feasibility analysis commissioned by Council, at the request of the Department, the provision of 5% of total GFA for the site has already been determined to be the feasible affordable housing contribution rate for the Planning Proposal, based on a rate of \$18,272/m² of GFA. This would equate to a contribution of \$3,374,872 based on the Proponent's concept plans.

As per the Affordable Housing Contribution Scheme, the dwellings are to be dedicated to Council, with the residual amount (amount of required GFA left after dedication of the dwellings) calculated in accordance with the scheme at the rate of \$18,272/m² of GFA.

5. No strategic merit

The Planning Proposal does not demonstrate strategic merit when assessed against the NSW Planning & Environment's: A guide to preparing planning proposals.

The Planning Proposal is inconsistent with Council's strategic direction and has not demonstrated why it should be progressed ahead of the Mona Vale Place Plan and without the demonstrable strategic need for additional housing of this form in this location.

Further, the proposal does not adequately justify the rezoning of the subject property over and before other land adjoining the Mona Vale town centre zoned R2, or other land across LGA with similar characteristics and attributes.

Rezoning of the subject site risks setting a precedent for adjoining landowners to consider rezoning under the same premise.

It is therefore considered the Proposal has no strategic merit.

6. Insufficient justification

Insufficient justification has been provided for this Planning Proposal

As detailed above, the Planning Proposal is not the result of any endorsed LSPS, strategic study or report. Whilst Councils LSPS identifies an area of 1.5km around the Mona Vale centre to investigate medium density housing, a key principle is also to locate a greater diversity of housing and affordable housing options within reasonable walking distance (800m) of high-frequency public transport. The mechanism to further explore the location, demand and type of dwelling is Councils LHS and preparation of the Mona Vale Place Plan.

Action 15.1 of the LSPS is for Council to prepare and implement a LHS. Council adopted the LHS on 27 April 2021. The endorsed LHS does not consider the site for medium density housing.

Action 27.1 of the LSPS is for Council to prepare a place plan for Mona Vale and develop LEP and DCP controls to respond to LEP studies and support the revitalisation of the centre. Council has commenced the preparation of a place plan for Mona Vale.

The objective of the Planning Proposal is to provide additional medium density housing within the vicinity of the Mona Vale town centre via a spot rezoning. Spot rezonings are not the best means of achieving the intended outcomes of providing a mix and diversity of housing to meet the needs of the local community whilst considering the unique character and impacts on infrastructure to support any proposed growth.

The best and most orderly way to explore and outline Council's approach to managing the location, type, and amount of new housing to meet the needs of the Northern Beaches community to 2036 is through Councils LHS and Place Planning of the Mona Vale area.

The Planning Proposal provides insufficient justification as to why it should proceed outside of the Mona Vale Place Planning process.

7. Precedent

The Planning Proposal may establish an unwanted precedent.

Whilst the subject site adjoins or is near a number of lots zoned R3 Medium Density to the east, most of the surrounding area to the west and south contains low density housing and is zoned R2 low density residential.

The subject site adjoins, at its rear boundary, properties that are also currently zoned R2 Low Density Residential. The same arguments put forward by the Proponent to support this current Planning Proposal could be used by owners of these adjoining properties in an attempt to justify the rezoning of their land.

The Proposal is therefore not consistent with the low-density character of the majority of the surrounding area.

The proposal does not adequately justify the rezoning of the subject property over and before other land adjoining the site or within the Mona Vale town centre zoned R2 or other land across LGA with similar characteristics and attributes.

Consideration of rezoning of the subject site has the risk of setting a precedent for adjoining landowners, or other landowners of R2 zoned land to consider rezoning under the same premises.

Any increase in density in the R3 zone under the LEP should be considered holistically in the context of the precinct-based review being undertaken by Council in the Mona Vale Centre Investigation Area and Place Planning process.

Site Specific Merit

1. Transport

The site adjoins sites with a similar development style to that proposed under the subject rezoning proposal.

The main concern raised on traffic and transport grounds is the potential impact of the increased development potential on the operation of the signalised intersection of Darley Street West and Pittwater Road. It is noted that traffic data in the Traffic Impact Assessment report was collected in 2016 with no more recent data collected during or since the Covid 19 pandemic.

Although the increase in traffic associated with proposal is not large, more recent traffic data and intersection modelling would be required to support any subsequent development applications to gauge the impact on Darley Road West queue lengths and delays.

Secondary concerns relate to access to transport services from the subject site, noting that the nearest bus stops are more than 400m away making the location, making it less suitable as public transport-oriented development.

The planning proposal includes a Traffic Impact Assessment report that addresses the usual issues of concern. Intersection capacity and safety will need to be considered in any future applications. Additional lane capacity at Darley Street West needs to also be considered to address increased generation and demand attributed to any proposed development.

Any future application for the development consent must also consider compliance with AS2890, AS1742, and provide suitable connections from the development to Council's Active Transport Network and to public transport connections.

The planning proposal is not opposed on traffic and transport grounds subject to the above areas of concern being addressed in any future development proposals

2. Flooding

- The subject site is affected by Low Risk and Medium Risk flood hazards in accordance with Council's Flood Hazard Map adopted in 2019.
- An existing overland flowpath traverses through the subject properties and continues towards Kunari Place (number 6, 8 and 10). The proposal involves diverting approximately 70% of the peak 1% AEP flows arriving from the south-east through a new shared access driveway to Darley Street West.
- The diverted flows arrive at Darley Street West and subsequently discharge overland towards Mona Vale golf course. The additional flows within Darley Street West will generally achieve flood depths and velocities that maintain the current flood risk hazard ($h_1 - h_2$).
- The 1% AEP afflux mapping indicates an increase in depths by up to 40mm on Darley Street West and to the reserve to the north adjacent to the golf course where additional overland flows have been directed.
- The post development flood modelling results indicate a reduction of flood depths for the 1% AEP event and PMF for 6, 8 and 10 Kunari Place ranging from 0.05 to 0.15m.

- The proposed buildings (C, D and E) have ground floor levels set at 1% AEP plus 500mm freeboard (4.91m AHD) associated with the diverted flows.
- The ground floor levels of both building A and B are elevated above existing overland flow paths and not impacted by local flood depths.
- Flood waters up to the PMF would not enter the undercover parking area (under building B and the new townhouses) as it is set at the PMF level of 4.64m AHD.

The proposal has been reviewed with consideration of the following:

- Direction 4.1 of the Local Planning Directions, Section 9.1(2) of the Environmental Planning and Assessment Act 1979.
- Pittwater LEP 2014 Clause 5.21 and 5.22.
- Pittwater 21 DCP Clause B3.11 Flood Prone Land and B3.12 Climate Change.
- NSW Government Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005 and Floodplain Risk Management Manual 2023.

The proposal is generally compliant with the above requirements except for Direction 4.1:

Local Planning Direction 4.1(3) states that:

A planning proposal must not contain provisions that apply to the flood planning area which:

- (a) permit development in floodway areas
- (b) permit development that will result in significant flood impacts to other properties, and
- (d) permit a significant increase in the development and/or dwelling density of that land

As per the McCarrs Creek, Mona Vale and Bayview Flood Study (2017), 161-167 Darley Rd Mona Vale are identified as containing a floodway in a 1% AEP flood. As the intensity of development permitted on the land would increase, the Planning Proposal is inconsistent with the Direction 4.1(3)(a).

As the Planning Proposal proposes a significant increase in the dwelling density on the land, from 5-10 dwellings to over 40 dwellings (over 300%), it is inconsistent with Direction 4.1(3)(d).

Flood level increases in the probable Maximum Flood (PMF) on the neighbouring property of 155 Darley St Mona Vale, as a result of the proposal, have been identified. It has not been demonstrated that they increases can be mitigated. The increases exceed 50mm, which is the threshold for adverse flood impacts in the Pittwater DCP.

The Planning Proposal is therefore inconsistent with Local Planning Direction 4.1(3)(b).

3. Biodiversity

A preliminary Ecological Assessment has been undertaken to support the proposal. Findings from the assessment identify that the subject site contains 0.19 ha of PCT 1214 Pittwater Spotted Gum Forest (PSGF), consistent with the Pittwater and Wagstaffe Spotted Gum Forest in the Sydney Basin Bioregion, listed as endangered under the Biodiversity Conservation Act 2016 (BC Act). The remainder of the subject site is comprised of Planted Native Vegetation (0.04 ha), exotic vegetation (0.22 ha) and existing developed land (0.17 ha).

The Ecological Assessment has estimated that the proposal will require the removal of approximately 0.09 ha of PSGF, 0.04 ha of planted native vegetation and 0.15 ha of exotic vegetation. These areas have been calculated based on area of the development overlapping the vegetation mapping prepared by the Ecologist.

The Ecological Assessment has concluded that as the subject site contains a total of 0.23 ha of native vegetation, of which, 0.13 ha is indicated to be impacted, the NSW Biodiversity Offset Scheme is unlikely to be triggered by this mechanism. A preliminary assessment of significance has also been conducted which indicated that a significant impact to threatened biodiversity is unlikely.

Indirect and prescribed impacts are required to be considered in assessment of whether the proposal triggers the BOS in accordance with the Biodiversity Conservation Act 2016 and Biodiversity Conservation Regulation 2017, thus entry into the BOS and preparation of a Biodiversity Development Assessment Report (BDAR) cannot be ruled out at this stage.

It is recommended that any future development design maximises efforts to avoid and minimise impacts to the biodiversity values of the site and locality, including Pittwater Wagstaff Spotted Gum Forest. As documented, further Biodiversity Assessment will be required as part of any development application to Council and should be based on final plans and incorporate the results of the Arboricultural Impact Assessment.

The assessment should conduct site surveys with reference to relevant published flora and fauna survey guidelines. In addition, the Ecological Assessment must address the proposals compliance with the local planning controls Pittwater 21 DCP cl. B4.3 Flora and Fauna Habitat Enhancement Category 2 Land & cl. B4.22 Preservation of Trees and Bushland Vegetation.

From the information supplied it is hard to determine the number of native trees that are proposed for removal, and whether it would be compliant with the DCP controls in relation to removal of tree canopy. An Arboricultural Impact Assessment Report, prepared by a qualified AQF5 (or higher) arborist, must be submitted with any development application when works are proposed within 5.0m of a tree irrespective of property boundaries. This may identify that further native vegetation requires removal due to location of tree, health of tree and/or application of relevant exemptions in accordance with the Pittwater 21 DCP.

4. Riparian, Catchments & Water Management

- ***Riparian*** - While the site is located at the valley margin of the floodplain and subject to a flooding regime the site is not located in a riparian area or riparian buffer zone.
- ***Water Management***- The Water management for development policy will be applicable to development applications.
 - Future developments on the site will be required to comply with Chapter 4 of Council's Water Management for Development Policy, including demonstration that impervious areas are minimised and Water Sensitive Urban Design is incorporated in the landscaping and build design to meet the Policy's General Stormwater Quality Requirements.
 - This is achievable based on the provided concept plans.
- The above considerations can be integrated onto the planning proposal and developed during the concept and detail design stages.