



Planning Proposal

2023 Heritage Review

Amendment to *Willoughby Local Environmental Plan 2012*

Version ***April 2024***

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Part 1 — Objectives or intended outcomes

This Planning Proposal seeks to amend Willoughby Local Environmental Plan 2012 (WLEP 2012) by adjusting the boundaries of the existing Naremburn Heritage Conservation Area (HCA) – C8, introducing a new HCA, and designating 13 items as Local Heritage Items, consistent with the findings of the heritage assessment undertaken by LSJ Architect.

The area/properties affected are as follows:

Part 1 - Proposed Heritage Conservation Areas

- Extension of the Naremburn Heritage Conservation Area (C8) to include a portion of the study area (refer to Figure 1 and 2 below) bounded by Hutton Lane, Northcote Street and Dalleys Road
- Establishment of a new Heritage Conservation Area as the *Naremburn Civic Centre Heritage Conservation Area*. This includes the adjustment of boundaries, with properties numbered 1 to 9 Ross Street being removed from the Naremburn Heritage Conservation Area and instead incorporated into the proposed *Naremburn Civic Centre Heritage Conservation Area*.

Part 2 - Proposed Heritage Items of Local Significance

Landscape items:

- The Scarp Retaining Wall, Castlecrag
- The Rampart Culvert, Castlecrag
- Flat Roofed Stone Bridge, between 79 and 81 The Bulwark, Castlecrag
- Arched Stone Bridge, between 86 and 88 The Bulwark, Castlecrag
- Henry Lawson Cave, Flat Rock Gully, Naremburn

Built Items:

- Rivett House, 148 Edinburgh Road, Castlecrag
- Albion House, 2 The Rampart, Castlecrag
- Hedberg House, 42 The Bulwark, Castlecrag
- The Salvation Army Citadel, 121 Victoria Avenue, Chatswood
- Boronia, 58 Johnson Street, Chatswood
- Chatswood Bowling Club, 655 and Part 655A Pacific Highway, Chatswood
- 23 & 25 Dalleys Road, Naremburn
- Sisters of St Joseph's Convent, 36 Merrenburn Avenue, Naremburn

Part 2 — Explanation of Provisions

The intent of the Planning Proposal can be achieved by amending WLEP 2012 as follow:

Part 1 - Proposed Heritage Conservation Areas

Make the following amendments to the Part 1 of Schedule 5:

- Extension of the Naremburn Heritage Conservation Area (C8) to include a portion of the study area (refer to Figure 1 and 2 below) bounded by Hutton Lane, Northcote Street and Dalleys Road
- Establishment of a new Heritage Conservation Area as the *Naremburn Civic Centre Heritage Conservation Area*. This includes the adjustment of boundaries, with properties numbered 1 to 9 Ross Street being removed from the Naremburn Heritage Conservation Area and instead incorporated into the proposed *Naremburn Civic Centre Heritage Conservation Area* (refer to Figure 1 and 2 below)

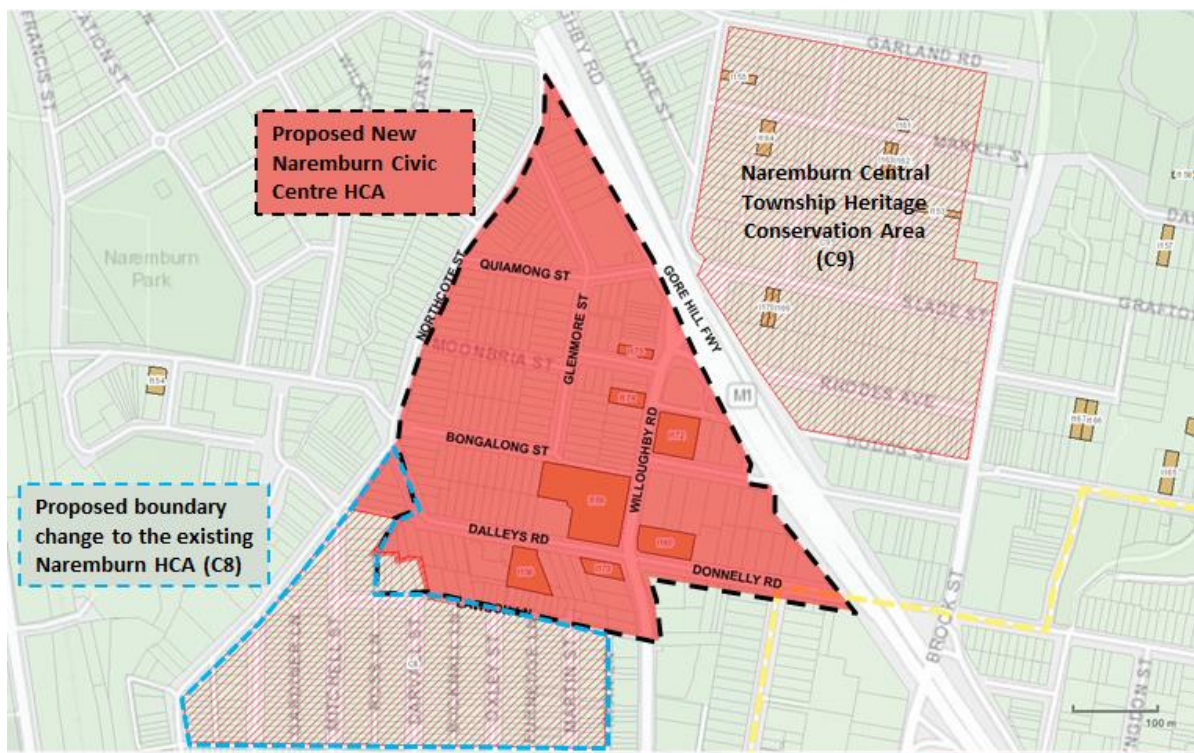


Figure 1: Aerial map showing study area (shaded in red) between the two existing Heritage Conservation Areas (hatched in red)

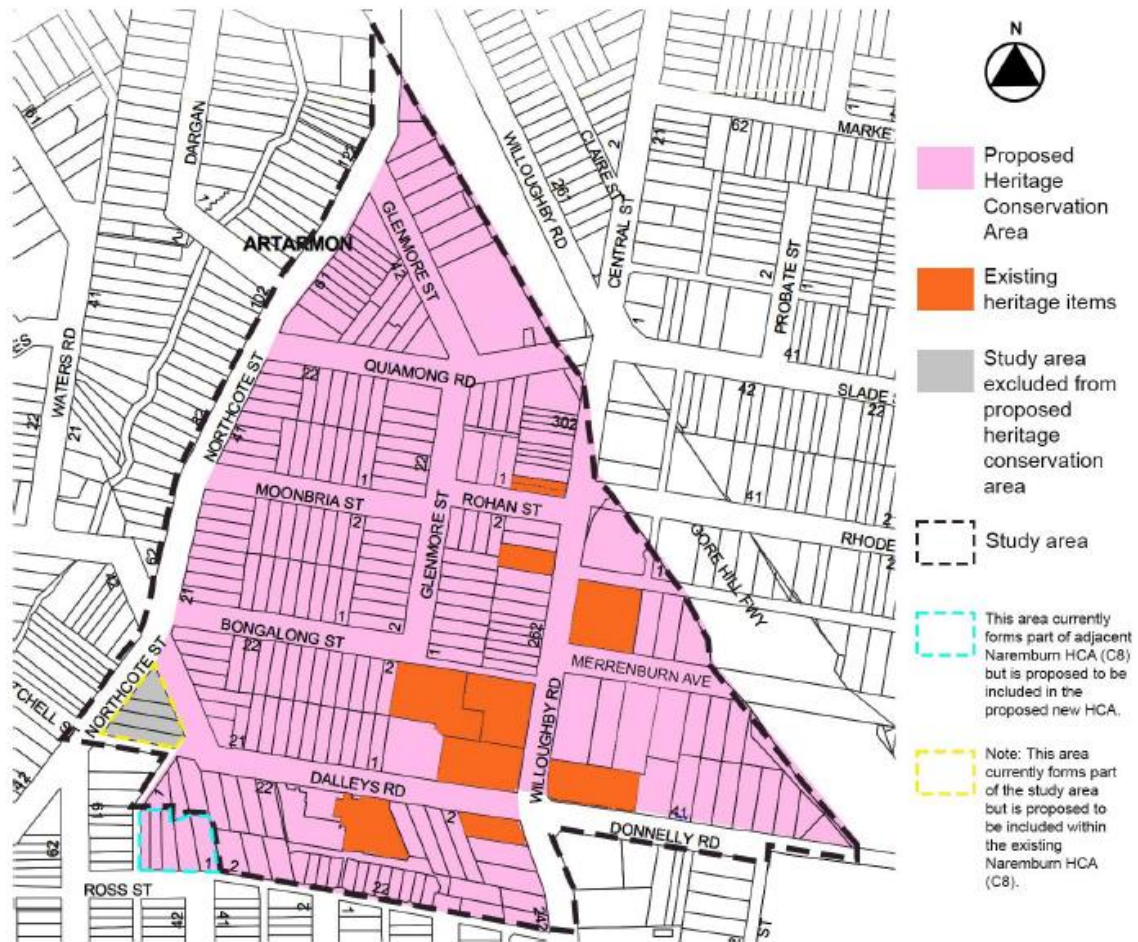


Figure 2: Proposed boundaries to the proposed heritage conservation area

Part 2 - Proposed Heritage Items of Local Significance

Inserting the following new items into Part 1 of Schedule 5:

Landscape Items

Suburb	Item Name	Significance	Item No
Castlecrag	The Scarp Retaining Wall	Local	I161
Castlecrag	The Rampart Culvert	Local	I162
Castlecrag	Flat Roofed Stone Bridge Between 79 and 81 The Bulwark	Local	I163
Castlecrag	Arched Stone Bridge Between 86 and 88 The Bulwark	Local	I164
Naremburn	Henry Lawson Cave, Flat Rock Gully	Local	I165

Built Items

Suburb	Item Name	Address	Property Description	Significance	Item No
Castlecrag	Rivett House	148 Edinburgh Road	Lot 2, DP315876	Local	I166
Castlecrag	Albion House	2 The Rampart	DP 341975 and Lot 1 DP 115889	Local	I167
Castlecrag	Hedberg House	42 The Bulwark	Lot 465, DP19826	Local	I168
Chatswood	(former) Salvation Army Citadel	121 Victoria Avenue	Lot 10, DP10079	Local	I169
Chatswood	Boronia (Loreto)	58 Johnson Street	Lot 23, DP1556	Local	I170
Chatswood	Chatswood Bowling Club	655 Pacific Highway	Lot 2 DP 861346	Local	I171
Chatswood	Front wall and gate pier in front of 655A Pacific Highway, Chatswood	part 655A Pacific Highway	part SP57067	Local	I172
Naremburn	Sisters of St Joseph's Convent	36 Merrenburn Avenue	Lot 2 DP 115889, Lot B DP 341975	Local	I173
Naremburn	N/A	23 & 25 Dalleys Road	SP 9070 (No. 23) / Lot A DP 306470 (No. 25)	Local	I174

The Willoughby LEP Heritage Map will be amended by including the above properties.

Part 3 — Justification

The heritage significance of the Presbytery and the School Buildings has been assessed and established by the Holtham Report, which is Appendix 1 to this Planning Proposal.


Listing as a local heritage item will provide ongoing protection and recognition of the heritage significance of the Presbytery and the School Buildings.

Section A – Need for the Planning Proposal

Q1 — Is the Planning Proposal a result of any strategic study or report?



Yes. The need to amend WLEP 2012 has arisen from the recommendations of an independent heritage assessment (see Appendix 1 for a full appraisal. A summary of these findings are as follows:



Table 1: Proposed (changes) Heritage Conservation Areas

Item Name	Recommendation Summary
The Naremburn Central Township Heritage Conservation Area (C9)	The study area and the Naremburn Central Township Heritage Conservation Area (C9), both characterized by historical development around a commercial and civic centre along Willoughby Road. Despite sharing architectural features and historical patterns, the construction of the Warringah Freeway/Gore Hill Freeway has physically separated the two areas, disrupting their historical continuity. Therefore, it is recommended that the Naremburn Central Township HCA (C9) not be expanded to include the study area.
The Naremburn Heritage Conservation Area (C8)	<p>C8 situated immediately south of the study area, has historical significance stemming from Edward Wollstonecraft's land grant and the Crow's Nest Subdivision No. 4. A portion of this subdivision, bounded by Hutton Lane, Northcote Street, and Dalleys Road, overlaps with the study area.</p>  <p>Figure 3: Map showing the boundaries of the Naremburn Heritage Conservation Area and the subdivisions the of Fowler Estate, Doyle's Estate and Berry's Estate at the intersection of the Naremburn HCA and the adjacent proposed Naremburn Civic Centre HCA (Source: WDCP, Part H)</p>

	<p>C8 and the study area share similarities in terms of street patterns and architectural styles, the Naremburn HCA stands out due to its distinct boundaries defined by older subdivisions. Recent developments further differentiate the two areas.</p> <p>However, a specific portion along Hutton Lane, Northcote Street, and Dalleys Road (No. 13 to 17 Northcote Street and No. 32 Dalleys Road) of the study area aligns closely with the historical development pattern of the Naremburn HCA, prompting the recommendation to extend C8 to include this portion.</p>
New Naremburn Civic Centre Heritage Conservation Area	<p>Establishment of a new HCA</p> <p>The study area is delineated by major roads (the Gore Hill Freeway to the east, Northcote Street to the west, and Donnelly Road, Dalleys Road, and Lawson Lane to the south) and featuring historical developments from the late 19th and early 20th centuries.</p> <p>Despite the impact of the Gore Hill Freeway, the area's subdivision pattern, street layout, and most buildings remain intact. Willoughby Road serves as a significant civic and commercial hub. The presence of significant community and institutional buildings around the intersection of Willoughby and Donnelly roads is a distinctive and rare feature of the study area, adding to its aesthetic and historical value.</p> <p>While other Heritage Conservation Areas (HCAs) in the Willoughby City Council area consist of Federation-era suburbs, they lack the modest residential development prevalent in the study area. The study area retains evidence of early development, particularly in its commercial, civic, and institutional precincts, reflecting the historical evolution of Naremburn as one of the council's earliest areas.</p> <p>Considering the comprehensive analysis of significance, including physical, historical, and comparative assessments, it is recommended to designate a portion of the study area as a discrete heritage conservation area under Schedule 5 of the Willoughby Local Environmental Plan 2012.</p> <p>Boundaries of the proposed new HCA</p> <p>Refer to Figure 3 above, in order to take into account the whole of the Fowler Estate subdivision, it is recommended that No. 1 to 9 Ross Street be removed from the Naremburn HCA and instead included within the proposed new HCA, the Naremburn Civic Centre HCA.</p> <p>In addition, as previously discussed, that area of the study area bounded by Hutton Lane, Northcote Street and Dalleys Road should not be included within the proposed Naremburn Civic Centre HCA, but rather incorporated into the adjacent Naremburn HCA (refer to Figure 2 above).</p>

Table 2: Landscape Items

Item Name	Address	Recommendation summary	Location Plan
The Scarp Retaining Wall	The Scarp, adjacent to Castlehaven Reserve	<p>The Scarp Retaining Wall is built between 1930 and 1936, it is a significant part of Walter Burley Griffin's design for the area. Constructed with locally sourced rough sandstone blocks, its arrangement exemplifies Griffin's integration of natural and built elements. Alongside other landscape features, it forms a cohesive network of infrastructure reflecting Griffin's holistic urban design philosophy. Its preservation is valued by the community as a rare representation of Griffin's pioneering work in harmonizing the environment.</p> <p>It is recommended to list as a local heritage item. Consider undertaking comprehensive study of all landscape items within Castlecrag and list as a group.</p>	
The Rampart Culvert	The Rampart, Castlecrag. Near to Turret Reserve	<p>The Rampart Culvert, an integral feature of Walter Burley Griffin's Castlecrag Reserve, embodies his philosophy of harmonizing natural landscapes with architectural design. Constructed alongside The Rampart roadway between 1922 and 1923, it showcases Griffin's expertise in blending built structures with the surrounding environment. Crafted from locally sourced sandstone, the culvert reflects Griffin's commitment to using natural materials in his designs. As part of Castlecrag's landscape infrastructure, it illustrates Griffin's holistic approach to urban planning and remains a revered example of his visionary work.</p>	

		<p>It is recommended to list as a local heritage item. Consider undertaking comprehensive study of all landscape items within Castlecrag and list as a group.</p>	
Flat Roofed Stone Bridge Culvert	The Bulwark, Castlecrag. Between 79 and 81 The Bulwark	<p>The Flat Roofed Stone Bridge Culvert is constructed between 1928 and 1930, it is an integral feature of Walter Burley Griffin's design for the area. Made from rough-hewn sandstone, likely sourced locally, it reflects Griffin's commitment to blending natural and built elements. Alongside other landscape structures, it contributes to a cohesive network of infrastructure, showcasing Griffin's holistic urban design approach. Appreciated by the community, it stands as a rare example of Griffin's pioneering work in harmonizing the environment.</p> <p>It is recommended to list as a local heritage item. Consider undertaking comprehensive study of all landscape items within Castlecrag and list as a group.</p>	
Arched Stone Bridge Culvert	The Bulwark, Castlecrag. Between 86 and 88 The Bulwark	<p>The Arched Stone Bridge Culvert is constructed between 1928 and 1930, it is a vital component of Walter Burley Griffin's vision for the area. Crafted from rough-hewn sandstone, likely sourced locally, its distinctive barrel-vaulted design reflects Griffin's commitment to blending natural and man-made structures seamlessly. Together with other landscape features, the culvert forms an interconnected network of infrastructure, showcasing Griffin's holistic approach to urban design. Revered by the community, it stands as a rare testament to Griffin's</p>	










		<p>pioneering work in harmonizing the built environment with nature.</p> <p>It is recommended to list as a local heritage item. Consider undertaking comprehensive study of all landscape items within Castlecrag and list as a group.</p>	
Henry Lawson Cave	Flat Rock Gully, Naremburn	<p>The Henry Lawson Cave holds historical and cultural significance as a temporary refuge for renowned writer Henry Lawson and a source of inspiration for his poetry. It is a rare remaining natural feature in Flat Rock Gully, symbolizing the area's historical landscape amidst urban development. The cave's unique sandstone structure and association with Lawson contribute to its value, further emphasized by its role as a venue for bush poetry performances and community events. Overall, it represents a cherished and multifaceted aspect of local heritage and cultural identity.</p> <p>It is recommended to list the cave and associated amphitheatre together as a local heritage item.</p>	


Table 3: Built Items

Rivett House	148 Edinburgh Road, Castlecrag	C4 Environmental Living	<p>Rivett House is located within the Griffin Conservation Area. It holds historical and associational significance as one of the earliest residences designed by Walter Burley Griffin within the Castlecrag Estate. Despite controversial alterations by owner Dr. Edward Rivett during construction, such as the addition of an ungainly pitched roof, the property remains a testament to Griffin's architectural contributions in Australia. Although deviating from the dominant architectural character of Castlecrag, the residence retains original elements of Griffin's design, including Hume Pipe</p>	
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			<p>columns and rounded ends. Additionally, the later two-storey garage addition showcases Griffin's evolving architectural style. Despite its alterations, the property holds social and aesthetic value, attracting public interest in the history and architecture of the area.</p> <p>It is recommended to list as a local heritage item. Further, internal inspection is required before including interiors into listing.</p>	
Albion House	2 The Rampart, Castlecrag	C4 Environmental Living	<p>Albion House is located within the Griffin Conservation Area.</p> <p>It holds significance as a well-preserved residence designed by architect Eric Nicholls, contributing to the Castlecrag Estate's architectural heritage. Representing Nicholls' distinctive Modernist style, it showcases symmetrical curved bays, a smooth rendered finish, and a unique entry treatment. The house gained recognition in Building magazine in 1942. Situated on an irregular plot above street level, its surrounding garden, landscaped verge, and exposed rock outcrops reflect Walter Burley Griffin's design principles for the Castlecrag Estate.</p> <p>It is recommended to list as a local heritage item. Further, internal inspection is required before including interiors into listing.</p>	
Hedberg House	42 The Bulwark, Castlecrag	C4 Environmental Living	<p>Hedberg House is located within the Griffin Conservation Area, it is of significance as a relatively rare, substantially intact residence designed by noted architect Eric Nicholls, featuring many of the characteristic elements of his style, which, by the late 1940s had been developed and refined into a distinct brand of modernism. The use of sandstone, integration of house and garden, rounded forms and rendered surfaces are key characteristics of Nicholl's work that are evident at No. 42 The Bulwark, whilst still demonstrating the influence of W.B. Griffin's Castlecrag architectural approach and principles.</p>	

			<p>It is recommended to list the item and its interiors for local heritage listing.</p>	
(former) Salvation Army Citadel	121 Victoria Avenue, Chatswood	R2 Low Density Residential	<p>The Chatswood Salvation Army Citadel holds historical significance as the second citadel established on the north shore, showcasing the growth of the Salvation Army in Australia during the 20th century. Designed by Percivale Dale, a prominent Salvation Army architect, the building reflects the standardized design approach adopted for Citadel buildings, emphasizing simplicity and practicality. Despite alterations, such as the addition of a portico, the Citadel retains its original external and internal features, representing both Salvation Army architecture and Percivale Dale's work. The Citadel likely holds social significance for former and current members of the Salvation Army and other religious institutions that have occupied the building.</p> <p>It is recommended to list as a local heritage item. Further, internal inspection is required before including interiors into listing.</p>	
Boronia (Loreto)	58 Johnson Street, Chatswood	R2 Low Density Residential	<p>Boronia is located within the South Chatswood Significance Conservation Area. It holds historical significance as a well-preserved Federation cottage built in 1913. It retains its original exterior design, interior layout, and detailing, offering insight into domestic life during the early 20th century. The property serves as the headquarters and museum of the Willoughby District Historical Society since its establishment in 1993, showcasing exhibitions and collections related to Willoughby's history. Notable members of the society, such as Eric Wilksch, have made significant contributions to the community. Boronia is highly regarded by the local community for its role as a historical museum and the valuable collections it houses.</p> <p>It is recommended to list as a local heritage item.</p>	

Chatswood Bowling Club	655 Pacific Highway, Chatswood	RE2 Private Recreation	<p>The Chatswood Bowling Club, established in 1899 and is historically significant as a recreational facility with continuous use since its construction in 1900. Designed by architect Clifford H. Finch in 1938, the building reflects both early 20th-century Federation architecture and 1930s modifications. It holds association with original club members and serves as a representative example of a bowling club, showcasing evolving architectural styles.</p> <p>It is recommended to list as a local heritage item.</p>	
Front wall and gate pier in front of 655A Pacific Highway, Chatswood	part 655A Pacific Highway, Chatswood	part R3 Medium Density Residential	<p>The surviving brick wall and gate pier offer tangible evidence of its historical configuration. Esteemed by the lawn bowls community and local residents, the club remains a vital part of the community's social life.</p> <p>It is recommended to list as a local heritage item.</p>	
Sisters of St Joseph's Convent	36 Merrenburn Avenue, Naremburn	R3 Medium Density Residential	<p>The Sisters of St Josephs Convent has historical significance as a functioning convent since 1936, housing the Sisters of St Joseph of the Sacred Heart, founded by Saint Mary of the Cross. Designed by architect Edward Rodwell Green, it reflects ecclesiastical and Romanesque architectural styles. Together with adjacent buildings like the School and Church, it played a crucial role in Naremburn's development. The convent holds social significance for the Sisters, clergy, parishioners, former students, and the wider community of Naremburn.</p> <p>It is recommended for listing as a local heritage item. Further, consider listing as a group with the church, school and presbytery. Undertake internal inspection when possible.</p>	

N/A	23 & 25 Dalleys Road, Naremburn	R2 Low Density Residential	<p>23 & 25 Dalleys Road hold historical, associational, aesthetic, and rarity significance due to their well-preserved, finely detailed Modern and Moderne architectural elements. Notable features include the intricately designed corbelled window headings made of alternating chamfered light and dark bricks. Situated prominently on a corner, these buildings stand out within the local area and exhibit a distinctive form and configuration. They are associated with Harold Osmond Wilfred, a prolific builder responsible for numerous post-war constructions across the North Shore, making them rare surviving examples of his work. As representative examples of post-war flats found in the Willoughby LGA, they showcase many typical details and features of this architectural style.</p> <p>It is recommended to local listing as a pair.</p>	
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Q2 - Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes, this Planning Proposal is the best means to provide long term protection to the heritage significance of the item.

Section B – Relationship to strategic planning framework

Q3 - Is the Planning Proposal consistent with the objectives and actions of the applicable regional, sub-regional or district plans or strategy (including any exhibited draft plans or strategies)?

Greater Sydney Region Plan – A Metropolis of Three Cities 2018

Released in March 2018, A Metropolis of Three Cities (**Region Plan**) sets the planning framework for growth of Sydney to 2056. The vision seeks to transform Greater Sydney into a metropolis of three cities – the Western Parkland City, The Central River City and the Eastern Harbour City and sets targets of 725,000 new dwellings and 817,000 new jobs by 2036.

Objective 13 of the Region Plan is that “Environmental heritage is identified, conserved and enhanced.” In addition, Strategy 13.1 provides as follows:

“Identify, conserve and enhance heritage by:

- engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place*
- applying adaptive re-use and interpreting heritage to foster distinctive local places*
- managing and monitoring the cumulative impact of development on the heritage values and character of places.”*

The Planning proposal is consistent with Objective 13 in that it identifies buildings suitable for preserving for future generations.

North District Plan 2018

The *North District Plan* (**NDP**) informs local strategic planning statements and local environmental plans, the assessment of planning proposals and community strategic plans and policies. The NDP provides planning priorities consistent with the Objectives from the Region Plan. The Region Plan requires that councils work collaboratively with the Greater Sydney Commission (now Greater Cities Commission) to establish agreed 6 -10 year housing targets.

Planning Priority N6 of the NDP provides as follows:

“Creating and renewing great places and local centres, and respecting the District’s heritage.”

Additionally, Objective 13 of the Region Plan is replicated as Action 21 in the North District Plan.

The proposal to list the Property is consistent with Planning Priority N6 and Action 21 of the NDP, in that it identifies a place worthy of conserving and preserving for future generations.

Council has recently finalised a comprehensive review of the Willoughby LEP, culminating in substantial amendments which took force in June 2023. In particular, these amendments provided significant development potential uplift throughout identified ‘Railway Precincts’ and ‘Local Centres’ in order to meet the employment and housing targets set out in the NDP. These can still be comfortably achieved should this Planning Proposal proceed.

Q4 - Is the Planning Proposal consistent with a council's local strategy or other local strategic plan?

Yes. The relevant local strategies are detailed below.

Our Future Willoughby 2032

Our Future Willoughby 2032 is the Council's community strategic plan, providing a long-term vision for the future of the City. Our Future Willoughby 2032 is used to inform Council's decision making and planning.

The main Priority within Our Future Willoughby 2032 relevant to this Planning Proposal is:

2.2 Respect and celebrate our indigenous and non-indigenous history and heritage.

The Planning Proposal is consistent with this action as it provides for the protection of a heritage item worthy of conserving and celebrating.

Local Strategic Planning Statement 2020

Council prepared and adopted a Local Strategic Planning Statement on 10 February 2020 (**LSPS**), with assurance received from the Greater Sydney Commission on 20 March 2020.

The LSPS provides the basis for strategic planning in the Willoughby Local Government Area (**LGA**). It is required to have regard to economic, social and environmental matters and identify how the desired outcomes of the Region Plan and NDP will be achieved.

The LSPS is aligned with Council's former community strategic plan, the *Community Strategic Plan – Our Future Willoughby 2028*. That community strategic plan identified the priorities and aspirations of the community and the broader strategic direction of Council to align the delivery of policies, programs, projects and services. The LSPS specifies how its directions implement the actions identified in the community strategic plan.

The LSPS contains the following relevant priority:

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

The Planning Proposal is consistent with this principle as it ensures that an item of local heritage significance is protected and respected.

Q5 - Is the Planning Proposal consistent with applicable State Environmental Planning Policies?

The table below details how the Planning Proposal is consistent with relevant State Environmental Planning Policies.

SEPP title	Consistency	Explanation
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	YES	The Planning Proposal is consistent with the SEPP as it does not affect the attainment of the SEPP's aims and objectives. The expansion of the Existing

		Item will have consequences for the ability for certain works to be carried out as exempt and complying development under this SEPP.
State Environmental Planning Policy (Housing) 2021	YES	The Planning Proposal does not contain provisions that would affect the application of this SEPP.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	YES	The Planning Proposal does not contain provisions that would affect the application of this SEPP.
SEPP (Transport & Infrastructure) 2021	YES	The Planning Proposal does not contain provisions that would affect the application of this SEPP.
SEPP (Sustainable Buildings) 2022	YES	The Planning Proposal does not contain provisions that would affect the application of this SEPP.

Q6 - Is the Planning Proposal consistent with the applicable Ministerial Directions (s.117 Directions)?

The table below details how the Planning Proposal is consistent with applicable directions by the Minister under section 9.1 of the *Environmental Planning and Assessment Act 1979*.

No	Title of Direction and objectives	Comment	Compliance
1.1	Implementation of Regional Plans The objective of this direction is to give legal effect to the vision, land-use strategy, goals, directions and actions contained in Regional Plans	The Planning Proposal is consistent with the Greater Sydney Region Plan – A Metropolis of Three Cities and the North District Plan.	YES
1.3	Approval and Referral Requirements The objective of this direction is to ensure that LEP provisions encourage the efficient and appropriate assessment of development.	The Planning Proposal will be subject to consultation with State authorities as required by the Gateway Determination.	YES
1.4	Site Specific Provisions The objectives of this direction is to discourage unnecessarily restrictive site specific planning controls.	The Planning Proposal does not allow a particular development to be carried out.	YES
3.1	Conservation Zones The objective of this direction is to protect and conserve environmentally sensitive areas.	Applicable to this direction are the following items which are zoned C4 Environmental Living: <ul style="list-style-type: none"> - 148 Edinburgh Road, Castlecrag - 2 The Rampart, Castlecrag - 42 The Bulwark, Castlecrag <p>The proposed heritage listing is consistent with this Direction.</p>	

3.2	<p>Heritage Conservation</p> <p>The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.</p>	<p>The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.</p> <p>The creation of new heritage items and a new conservation area is consistent with this Direction.</p>	YES
6.1	<p>Residential Zones</p> <p>The objectives of this direction are:</p> <p>(a) to encourage a variety and choice of housing types to provide for existing and future housing needs,</p> <p>(b) to make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and</p> <p>(c) to minimise the impact of residential development on the environment and resource lands.</p>	<p>Council's current population forecast require delivery of 6,700 dwellings by 2036, Council is on track to exceed that target. The Planning Proposal will not impact Council's ability to exceed its housing target.</p> <p>The planning proposal does not seek to reduce any residential zoning under WLEP 2012.</p> <p>While promoting housing supply, the Proposal also enhances the heritage protection framework within the Willoughby LGA. By identifying and conserving significant heritage assets through the listing of new Heritage Conservation Areas (HCAs) and additional Local Heritage Items, the Proposal supports the conservation of cultural heritage alongside residential development.</p> <p>The Proposal facilitates efficient decision-making by providing clear guidelines for development within identified heritage areas. This ensures that future development is sympathetic to the heritage significance of the area while still meeting housing needs.</p> <p>The Planning Proposal is consistent with this Direction in that it enables there to be a choice of heritage dwellings to provide for existing and future housing needs.</p>	YES

Section C – Environmental, social and economic impact

Q7 - Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of this proposal?

No. The Planning Proposal will not adversely impact critical habitat or threatened species, populations or ecological communities or their habitats.

Q8 — Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

No. There are no likely environmental effects that would arise as a result of the Planning Proposal.

Q9 — Has the Planning Proposal adequately addressed any social and economic effects?

The public exhibition of the planning proposal will provide additional opportunity for the property owners and wider community to consider the proposed heritage listing.

Additionally, the progression of the Planning Proposal will not impact existing social infrastructure or existing retail centres. As noted at Section B above, the uplift in development potential effected by amendments to the Willoughby LEP will ensure that employment and housing targets set out in the NDP can be achieved should this Planning Proposal proceed.

It is noted additionally that the public exhibition of the planning proposal will provide additional opportunity for the owners of the Property and wider community to consider and comment upon the proposed amendment to the Willoughby LEP.

Section D – State and Commonwealth Interests

Q10 - Is there adequate public infrastructure for the Planning Proposal?

Yes. The Planning Proposal will have no impact on the demand for public infrastructure.

Q11 - What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

This section will be completed following consultation with public authorities identified in the gateway determination. Public authorities, including but not limited to the following, will be notified:

- Heritage NSW; and
- Heritage Council of New South Wales.

Any other authorities identified in the gateway determination will be consulted during the public exhibition of the Planning Proposal.

Part 4 — Mapping

The Planning Proposal requires amendment of the WLEP 2012 Heritage Map. It will require all of the items and conservation area in Table 1, 2 and 3 to be included in the Heritage Map along with the appropriate numbering detailed in Part 2 Statement of Objectives.

Figure 4 below illustrates the mapping changes for a new heritage item - The Scarp Retaining Wall.

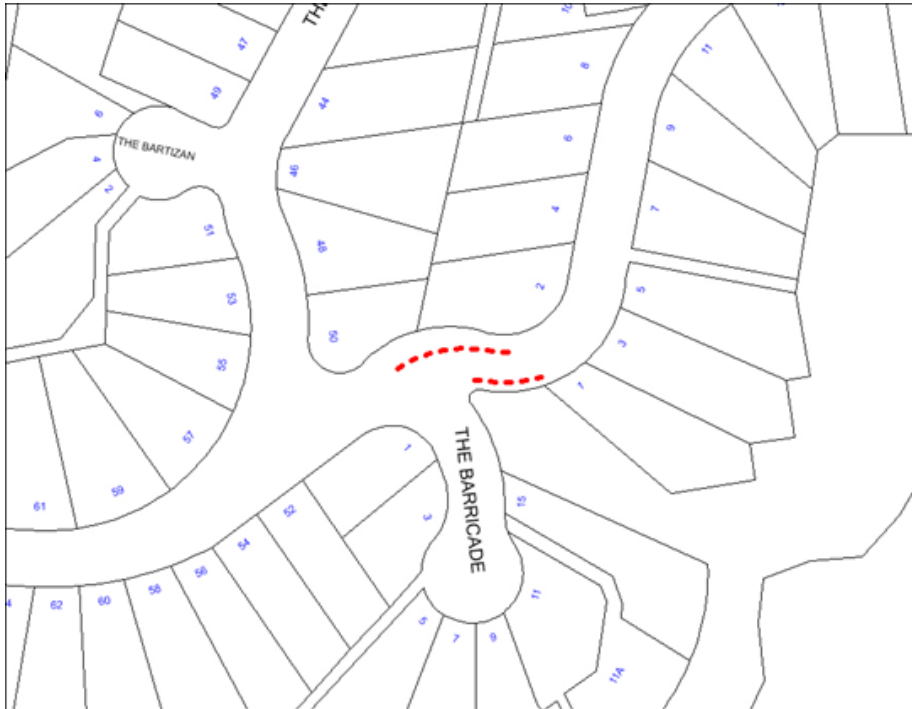


Figure 4: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 5 below illustrates the mapping changes for a new heritage item - The Rampart Culvert

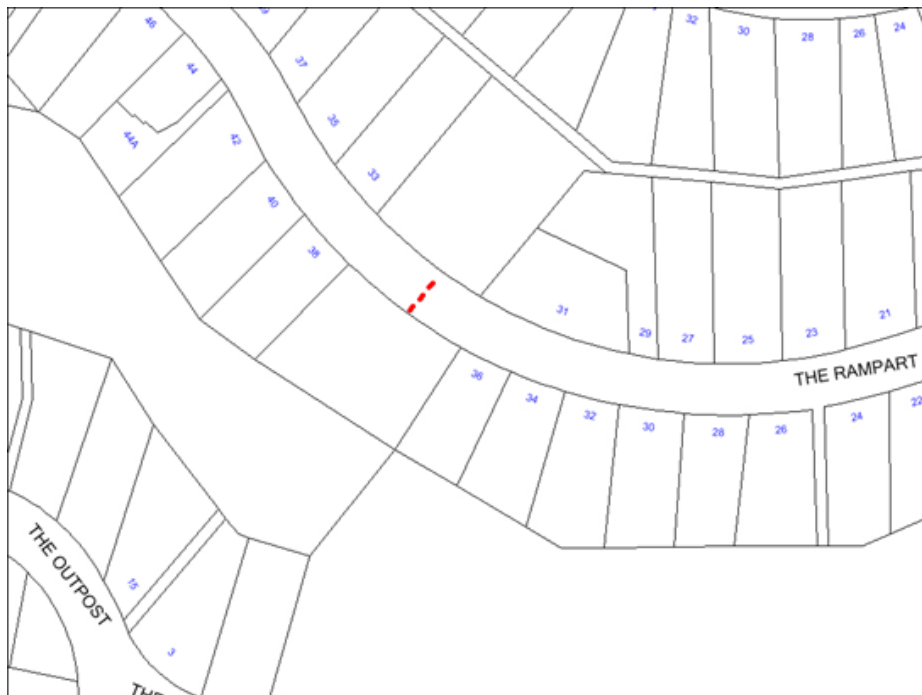


Figure 5: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 6 below illustrates the mapping changes for a new heritage item - Flat Roofed Stone Bridge Between 79 and 81 The Bulwark

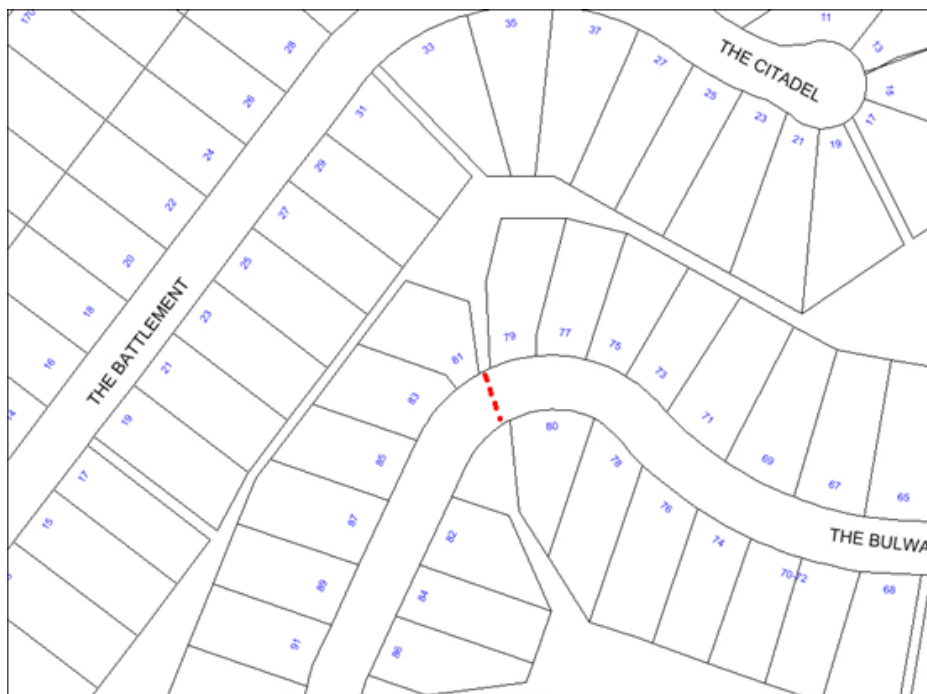


Figure 6: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 7 below illustrates the mapping changes for a new heritage item - Arched Stone Bridge Between 86 and 88 The Bulwark

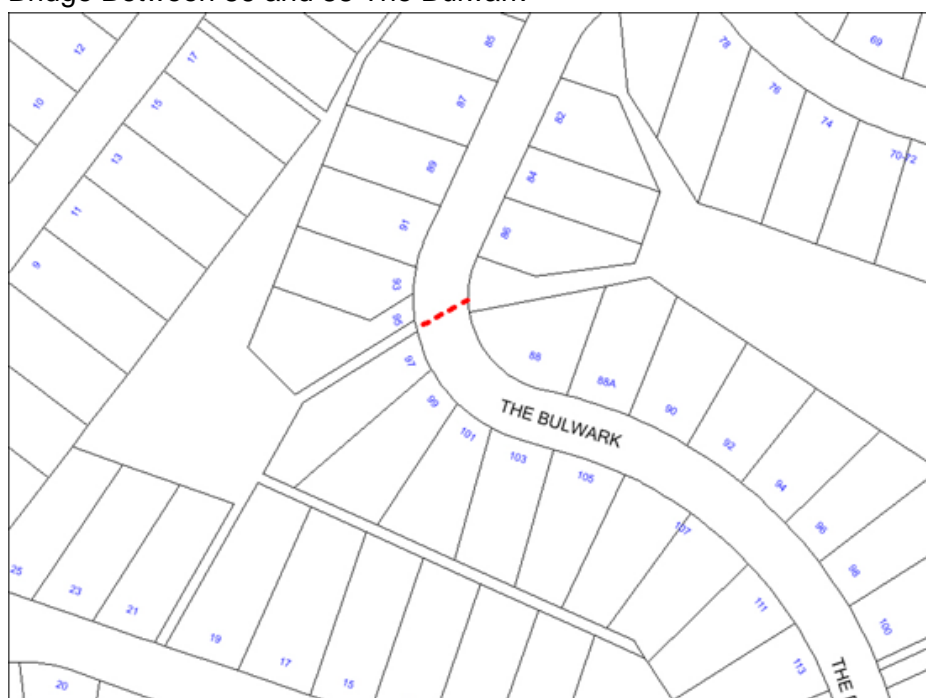


Figure 7: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 8 below illustrates the mapping changes for a new heritage item - Henry Lawson Cave, Flat Rock Gully

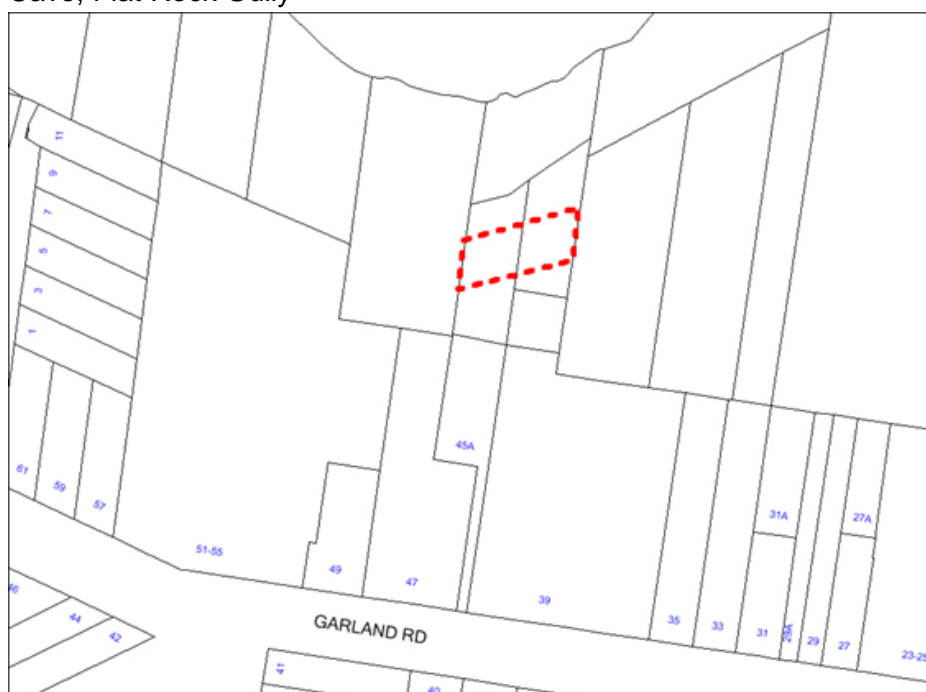


Figure 8: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 9 below illustrates the mapping changes for a new heritage item – 148 Edinburgh

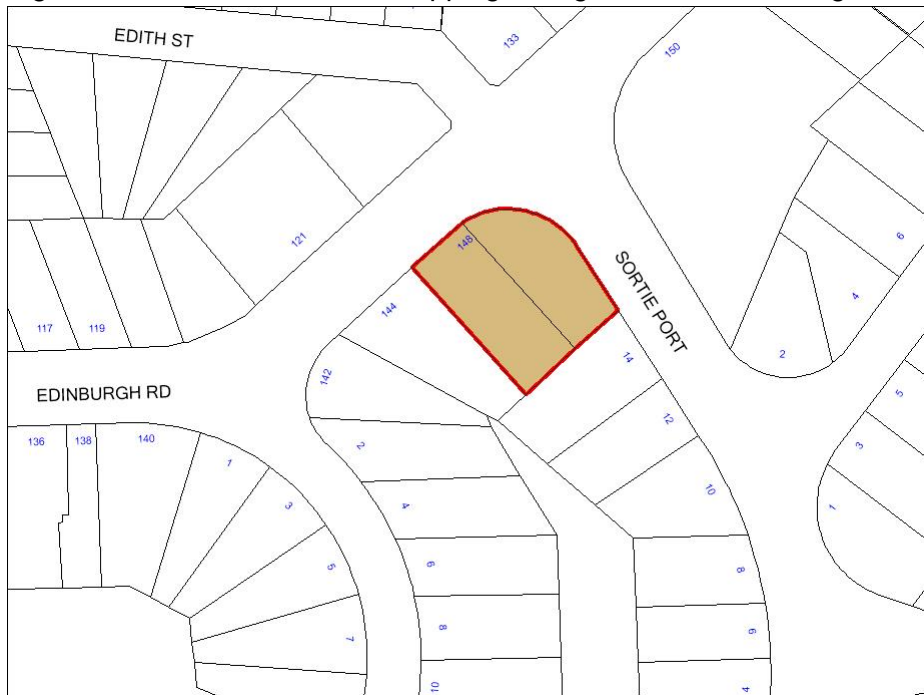


Figure 9: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 10 below illustrates the mapping changes for a new heritage item - 2 The Rampart, Castlecrag

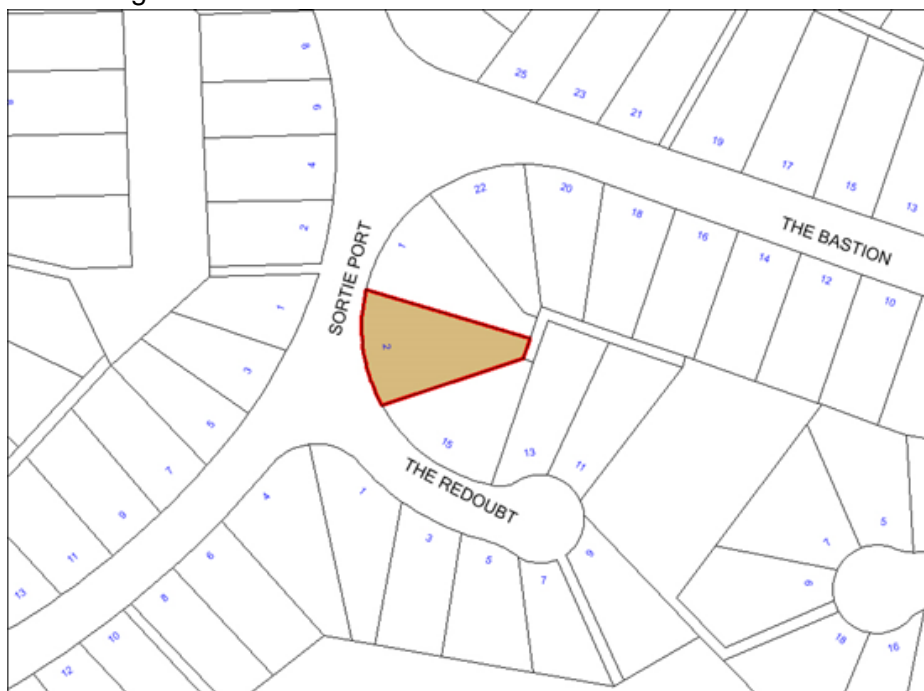


Figure 10: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 11 below illustrates the mapping changes for a new heritage item - 42 The Bulwark, Castlecrag



Figure 11: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 12 below illustrates the mapping changes for a new heritage item - 121 Victoria Avenue, Chatswood



Figure 12: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 13 below illustrates the mapping changes for a new heritage item - 58 Johnson Street, Chatswood



Figure 13: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 14 below illustrates the mapping changes for a new heritage item - 655 Pacific Highway, Chatswood



Figure 14: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 15 below illustrates the mapping changes for a new heritage item - Front wall and gate pier in front of 655A Pacific Highway, Chatswood

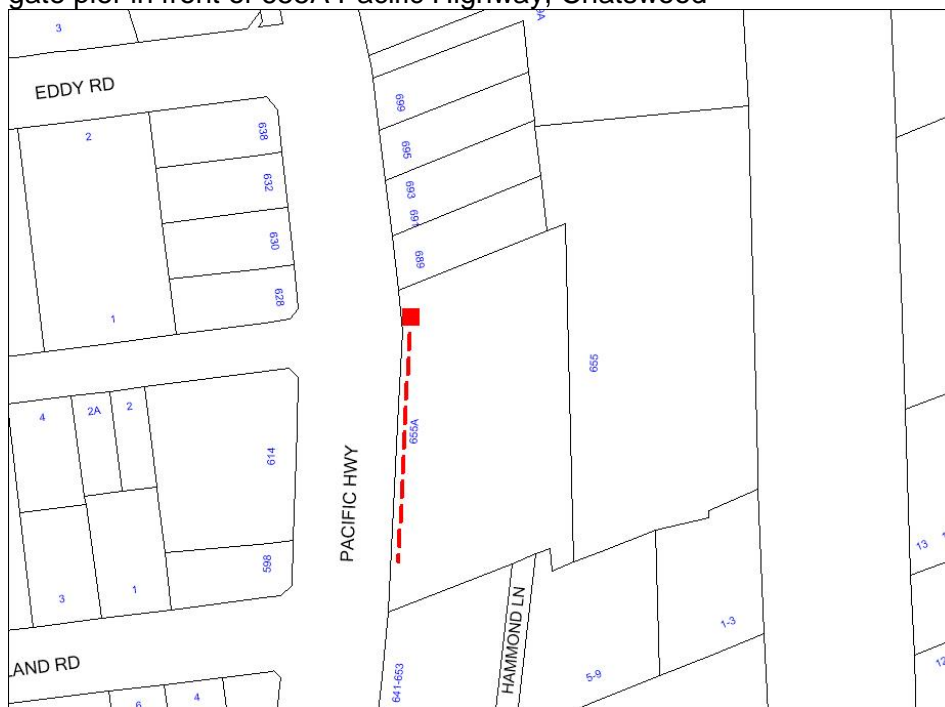


Figure 15: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 16 below illustrates the mapping changes for a new heritage item - 36 Merrenburn Avenue, Naremburn

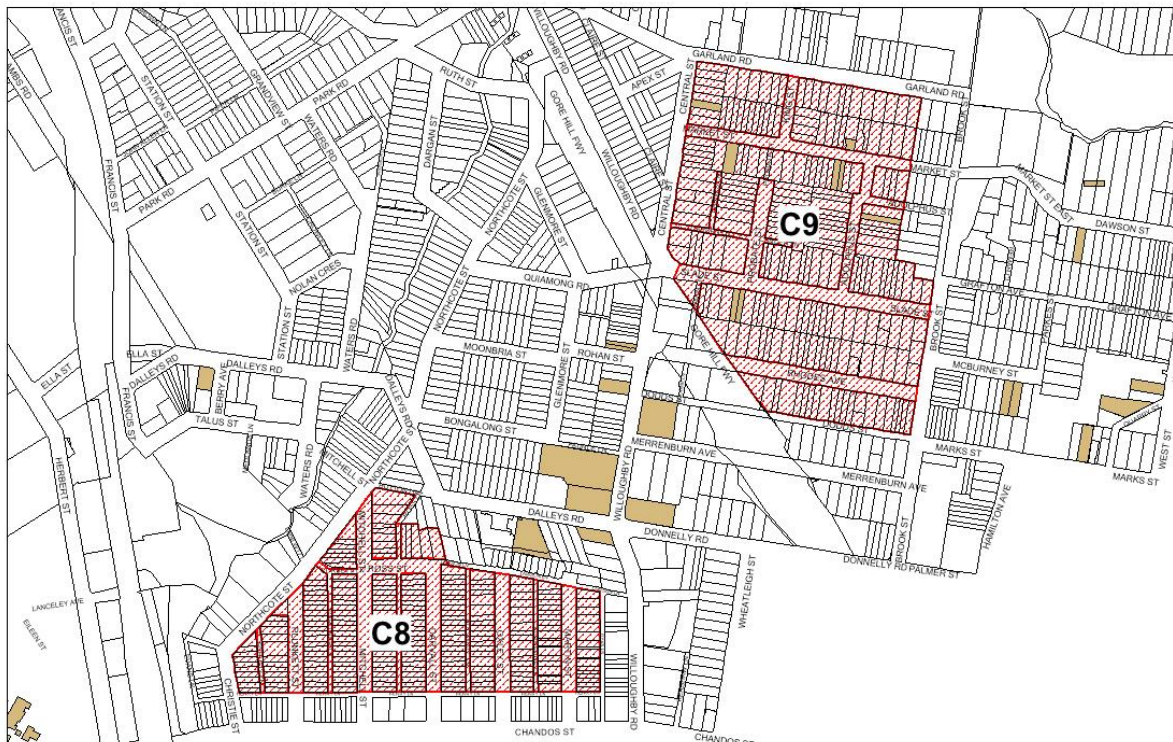


Figure 17 below illustrates the mapping changes for a new heritage item - 23 & 25 Dalleys Road, Naremburn



Figure 17: Proposed amendment to the Willoughby LEP's Heritage Map

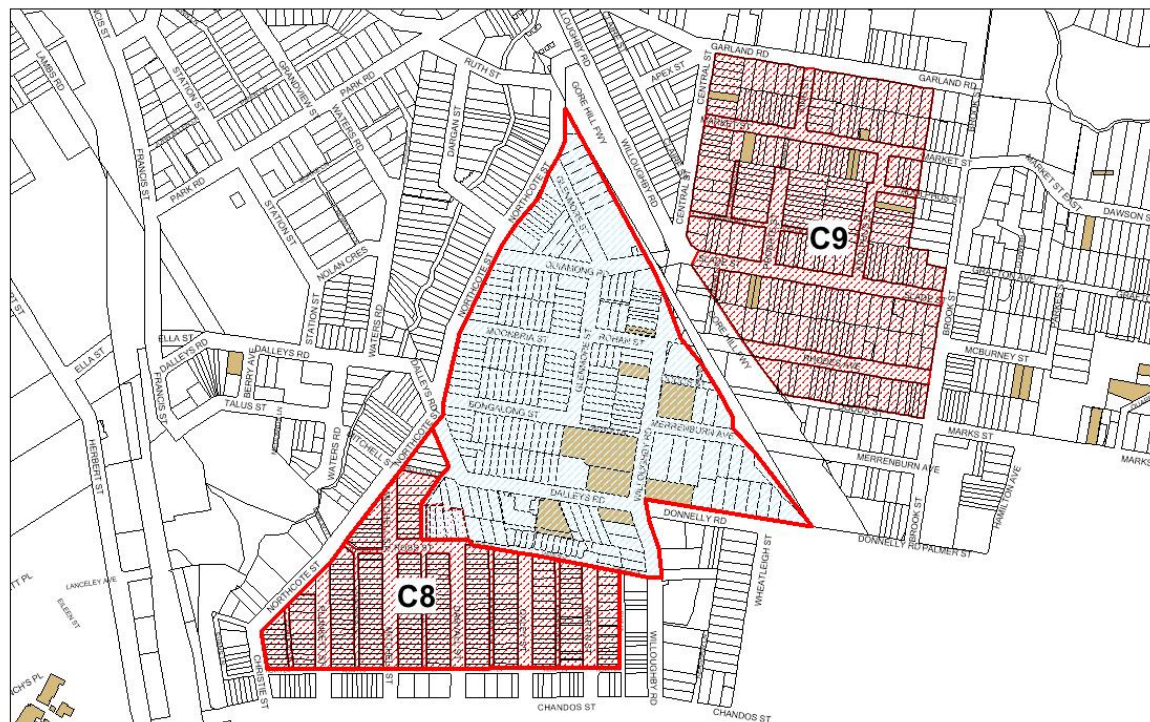
Figure 18 below illustrates the existing Heritage Conservation Area Map



- Existing Heritage Item
- Existing Heritage Conservation Area

Figure 18: Proposed amendment to the Willoughby LEP's Heritage Map

Figure 19 below illustrates the Proposed Heritage Conservation Area Map






-  Proposed New Heritage Conservation Area - Naremburn Civic Centre Heritage Conservation Area
-  Proposed Boundary Change to the Existing Naremburn Heritage Conservation Area (C8)
-  Existing Naremburn Central Township Heritage Conservation Area (C9)

Figure 19: Proposed amendment to the Willoughby LEP's Heritage Map

Part 5 — Community Consultation

The public exhibition of the Planning Proposal will be undertaken in accordance with the *Environmental Planning and Assessment Act 1979*, the *Willoughby Community Participation Plan (Willoughby CPP)* and the *Local Environmental Plan Making Guideline*, as well as any conditions of the gateway determination.

It is recommended that the Planning Proposal is exhibited for a minimum of 28 days.

Public exhibition of the Planning Proposal will be carried out in accordance with Part B of the Willoughby CPP and will comprise, at a minimum, the methods of community engagement required by Table 4 of the Willoughby CPP, including requests for written submissions, surveys and online engagement tools and the provision of a responsible officer contact point.

During the public exhibition period, the following material will be available on Council's website and in the customer service area at Council's offices:

- the Planning Proposal, in the form approved by the gateway determination;
- the gateway determination;
- information relied upon by the Planning Proposal (such as the LSJ's report); and
- the Willoughby LEP.

Part 6 — Project Timeline

As Council is authorised to exercise the functions of the Minister for Planning as local plan-making authority under section 3.36 of the *Environmental Planning and Assessment Act 1979*, the proposed timeline for completion is as follows:

Plan-making step	Estimated completion
Planning Proposal present to WLPP for advice	14 May 2024
Planning Proposal present to Council	24 June 2024
Gateway determination	August 2024
Public exhibition period/government agency consultation	August/September 2024
Submissions assessment	September/October 2024
Council assessment of Planning Proposal post-exhibition	November 2024
Council decision to make amendment to the Willoughby LEP	November 2024
Council to liaise with Parliamentary Counsel to prepare LEP amendment	December 2024
Forwarding of LEP amendment for notification	December 2024
Notification and commencement of the approved LEP	February 2025