



Ms Debra Just  
General Manager  
Willoughby City Council  
PO Box 57  
CHATSWOOD NSW 1470

Dear Ms Just

### **Willoughby City Council - Local Housing Strategy**

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

The Department commends Council on preparing a robust evidence base to support its LHS, providing Council with a clear understanding of the housing needs of the Willoughby local government area and a strong commitment to strategic planning.

I can confirm that I approve Council's LHS dated May 2020. My decision reflects the analysis undertaken to develop a comprehensive strategic planning and an evidence base to inform your LHS and the capacity to deliver 1,600 or more dwellings for the period 2021-26.

In doing so, I have determined that:

- The LHS addresses housing supply, including the 6-10 year housing target, to be delivered mainly through capacity under existing planning controls and well-advanced planning proposals.
- The LHS addresses the need for housing diversity with effective actions for delivery, although further commitment to monitoring and review is required.
- The LHS addresses housing affordability, including a robust evidence base and commitment to an affordable housing contribution scheme.
- The LHS is generally consistent with Section 9.1 Directions and SEPPs.
- The LHS is generally consistent with the North District Plan.

My approval is subject to the following requirements:

1. Council is to prepare and commence working to a comprehensive work program and implementation plan to the LHS within three months of this approval being granted and to share this with the Department. This is to ensure that the Department and other State agencies have a clear understanding of the roles and responsibilities required to deliver Willoughby's housing pipeline.

2. Council is to monitor and review the supply and delivery of housing, in particular to track its performance against the 6-10 year housing target and to evaluate what additional medium density and seniors housing continues to be delivered. A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to meet Willoughby's housing needs over the medium to long term.
3. The strategic approach to delivery of housing in the Willoughby Local Centres Strategy, while not explicitly detailed in the Local Housing Strategy, forms part of this approval. Implementation of this strategy and the Department endorsed Chatswood CBD Strategy will contribute to 10+year housing supply for the LGA.
4. Forecasting contained with the LHS and the Department's 6-10 year housing forecast indicate that Council is on track to meet the Greater Sydney Commission's (GCS) target of 1,600 to 1,800 additional dwellings in the 2021-2026 period. Although Council's Local Strategic Planning Statement provides a target of 1,400 to 1,600 dwellings, the LHS does not specifically adopt a 6-10 year housing target. Council is to therefore adopt and work towards achieving and exceeding a minimum housing target of 1,600 dwellings for this period to ensure that regional strategic planning can be appropriately managed.

Any planning proposals for new housing development will be assessed against the approved LHS and the requirements and advisory notes of this approval. Any State Government policy changes that may occur in the future are to prevail in the event of any inconsistency.

### *Implementing your LHS*

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

To meet these commitments, a detailed implementation plan is required. This should reflect a comprehensive work program for all strategic work Council commits to undertake to implement its LHS, and should include, but not limited to:

- Current Comprehensive LEP planning proposal to implement the Chatswood CBD Strategy, the St Leonards Crows Nest 2036 Plan, the Willoughby Local Centres Strategy, Council's affordable housing contribution scheme and changes to dual occupancy controls;
- Changes to the DCP to encourage better built form outcomes for townhouse development and greater apartment diversity; and
- Continued consultation with State infrastructure providers to discuss the housing forecasts in detail to enable matching and phasing, particularly regarding school provision and extra bus services from Chatswood to the Northern Beaches and along the "spine" roads servicing the local centres.

### *LHS Reviews and Updates*

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

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

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

Should you have any further questions, please contact Carina Lucchinelli, Specialist Planner on 9274 6563.

Yours sincerely



**Amanda Harvey**  
**Executive Director**  
**Local Strategies and Plan Making**

10 May 2021

Encl: Advisory Notes



# Willoughby Local Housing Strategy

## Advisory Notes

The following advisory notes identify the further work Council will need to undertake to strongly position future planning proposals and further iterations of the Local Housing Strategy. The advisory notes provide specific guidance on matters that Council is encouraged to consider when next updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure until the LHS is further updated in accordance with the approval requirements and these notes.

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<b>General</b>	
Implementation	<p>Future iterations of the LHS should be underpinned by an implementation plan with a priority work program, clearly defined roles, responsibilities and definitive timeframes with risks and dependencies identified. This is encouraged to be informed by resourcing and budgets to demonstrate how housing targets will be delivered.</p> <p>The implementation plan should specifically address:</p> <ul style="list-style-type: none"><li>• Current Comprehensive LEP planning proposal to implement the Chatswood CBD Strategy, the St Leonards Crows Nest 2036 Plan, the Willoughby Local Centres Strategy, Council’s affordable housing contribution scheme and changes to dual occupancy controls;</li><li>• Working closely with the Department to progress and finalise site specific Chatswood CBD planning proposals aligned with the Department endorse Chatswood CBD Strategy;</li><li>• Changes to the DCP to encourage better built form outcomes for town house development and greater apartment diversity; and</li><li>• Continued consultation with State infrastructure providers to discuss the housing forecasts in detail to enable matching and phasing, particularly regarding school provision and extra bus services along the “spine” roads servicing the local centres and from Chatswood to the Northern Beaches.</li></ul>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Review and monitoring framework	<p>Revisions to the LHS may be required in response to significant changes in the LGA such as announcements on new infrastructure investment and employment opportunities, significant changes in projected population growth or updates to the LSPS.</p> <p>The framework should also review the supply and delivery of housing, including the 6-10 year housing target and targets for medium density and seniors housing.</p>
Making appropriate provision for any additional housing opportunities that may arise out of sequence	<p>The inclusion of a transparent and robust framework to consider additional opportunities will assist Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit.</p> <p>Council is encouraged to develop a framework within which to consider such proposals, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Strategic merit and case for change</li> <li>• Robust demographic evidence</li> <li>• Demand analysis and economic impacts</li> <li>• Infrastructure delivery and funding to be borne by the proponent</li> <li>• Stakeholder consultation and outcomes</li> <li>• Sustainability and resilience</li> <li>• Social and affordable housing</li> </ul>
Community and Stakeholder Engagement	<p>Incorporate and address feedback received during exhibition of LHS as well as relevant community and stakeholder engagement in any updated or later version of the LHS.</p>
Consultation and engagement with agencies	<p>Council is to continue consultation with the following agencies:</p> <ul style="list-style-type: none"> <li>• TfNSW in relation to bus services between Chatswood and the Northern Beaches and along the “spine’ roads servicing local centres;</li> <li>• SINSW in relation to school provision, particularly in the context of the Chatswood CBD Strategy.</li> </ul>
Interdependencies with relevant local evidence base	<p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<b>Data</b>	
Clarification of 6 to 10 year and 10-20 year housing target	<p>The LHS should provide a breakdown of how Council will contribute to the 10+ year District target, including when and where anticipated supply will be delivered and explain market take up rates and methodology used.</p> <p>Council should ensure that all population and dwelling forecasts are cross-checked against published DPIE projections to provide greater transparency. Additional guidance and support can be arranged with the Department's Evidence and Insights division to resolve any discrepancies in dwelling forecasts and assist in understanding growth, particularly in the medium to long term.</p>