Urban Taskforce
AUSTRALIA

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Strategic Planning
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Draft Northern Beaches LEP and DCP 2026

To whom it may concern

I write in response to the public exhibition of the Northern Beaches draft Local Environment Plan (LEP) and Development Control Plan (DCP) 2026.

While Urban Taskforce Australia appreciates efforts by Council to create one consistent set of planning rules and design standards to guide future development in the LGA, we have concerns regarding the likely impact on housing supply across most of the LGA.

Measures adopted within the draft Plans do not appear to fully appreciate the proposed document's impact on the delivery of housing. Overall, the draft documents as exhibited result in more complication, include a range of matters which will increase the cost of construction and housing delivery which, in turn, significantly undermines new housing feasibility.

With the Sydney Plan stating clearly that feasibility is central to government decision making, there are aspects of this draft that are heading in the wrong direction.

In the midst of a housing supply crisis, our analysis of the ABS and DPHI data reveals that Northern Beaches Council is delivering around a quarter of its pro rata dwelling completions required under the National Housing Accord. These Plans throw an array of restrictions, barriers, and costs at development that will lead to less rather than more housing supply.

Key changes proposed in the LEP - Housing and Design

Dual Occupancy Development

While on the surface making dual occupancy development permissible in all R2 low residential zones is a positive step to addressing housing supply and diversity needs on the Northern Beaches, the imposition of minimum lot sizes of 800 square metres (sqm) for attached development or 900sqm for detached development, is simply a way to ensure it wont be delivered (outside of areas where the NSW LMR policy takes precedence over the LEP).

Medium Density Residential Development

As with dual occupancy development, Northern Beaches council makes all the right noises to support a diversity of housing typologies, including manor houses, multi-dwelling housing, residential flat building and seniors housing. All types of housing so

desperately needed on the Northern Beaches with its growing and aging population. However, contrary to these positive expressions of policy direction, under the draft documents as proposed, Council imposes minimum lot sizes that will restrict this type of development.

> *manor houses — 800 m^2; multi dwelling housing and terraces — 1,000 m^2; residential flat buildings — 1,000 m^2; seniors housing — 1,000 m^2*

Low Density Residential Zones

Urban Taskforce is supportive of Council's proposal to designate as Housing Diversity Areas (permitting boarding houses and hostels) in low density residential zones within 400 metres walking distance of local centres in Avalon, Newport, North Narrabeen, Freshwater and Belrose. However, once again the requirement for sites to be 1,000sqm or more, will simply make this form of development highly restricted.

Urban Taskforce is pleased to see Council standardise rules for secondary dwellings (granny flats) across the LGA, including the allowance of larger granny flats (up to 75 sqm) if attached to the main house.

However, we don't support the introduction of the proposed new floor space ratio (FSR) provision in low-density areas, allowing between 0.23:1 to 0.65:1 FSR depending on location and lot size. This will simply sterilise the area to any form of development other than detached homes. This is just another way Council is using development controls to prevent any change in its neighbourhoods.

Key changes proposed in the LEP – Centres

Urban Taskforce is generally supportive of the proposed LEP changes for Centres, especially in regard to building heights for employment generating development.

However, what is less clear are the new provisions that will apply to smaller neighbourhood centres. The fact that these new provisions will ensure development in these areas reflects their *local role, character and scale* suggests a policy that is not focused on change and therefore be anti-development.

The Sydney Plan requires that mixed use and residential development is permitted in all centres. This draft LEP/DCP plan does not fulfil this obligation.

Key changes proposed in the LEP - Environment and Resilience

At a time when the NSW Government, once again through its Sydney Plan, has made it clear that council's need to develop a pipeline of feasible housing supply, Northern Beaches Council seems to be doing the opposite.

Many of the proposed changes including: excessive minimum landscaped area requirements (40-50% in R1 and R3 zones); onerous new minimum tree planting and deep soil requirements (up to 30%); the requirement that all new residential development need to be all electric; all adds to the cost of development and undermines housing development and supply feasibility.

It is worth noting that the deep soil zones prevent any building above or below the surface. This is particularly impactful on the ability to maximise Gross Floor Area, as well as achieving the provision of efficient and economical basement parking that serves the development.

Key changes proposed in the DCP – Housing and design

Most of the changes proposed to house and design within the DCP are simply restrictive on new development. Onerous boundary setbacks of 6.5m at the front and 6.5-8m at the rear will simply prevent any change in housing stock.

Urban Taskforce strongly opposes the proposed new controls for housing diversity and family-friendly apartments and design, which not only specify a mix of one- and 3-bedroom apartments, but also costly design features such as *generous internal spaces and wider hallways that can accommodate prams*.

It should be left to the market to decide what mix of housing is appropriate in a development. All these requirements do, is simply make development unfeasible and result in less housing being built.

The requirement for new apartments to meet the **Liveable Housing Design Guidelines (Silver Level)** *and provide 25% of dwellings as adaptable.*

The adoption of these standards was explicitly postponed by Minister Chanthivong pending a review of the NCC. Council should adopt the same position.

The development industry supports the delivery of good quality housing, but Urban Taskforce is concerned that Council's proposed controls while have a detrimental impact on supply and feasibility and the entire document should be reviewed with this in mind.

Urban Taskforce believes that Council should be more pragmatic and look to facilitate future development within its LGA.

Key changes proposed in the DCP for Centres

Urban Taskforce does not support the minimum requirements of 25% commercial component in shop-top housing developments. This should be substantially reduced.

While the draft DCP will be refined so this requirement will only apply to larger centres in the former Pittwater and Warringah areas, these are exactly the areas where this sort of development is likely to occur. This is yet another onerous restriction to ensure that development is severely curtailed.

Urban Taskforce also strongly objects to the requirement for larger developments (valued over $10 million) to integrate public art into their design. This is just an unnecessary cost that will simply make apartments more expensive. Public art should be funded through the rate payer base, which will grow with increased housing supply.

Key changes proposed in the DCP - Heritage

Urban Taskforce is concerned that the objectives and controls around heritage in the draft DCP are particularly onerous and are yet another method to stymie new development.

Of particular concern is the introduction of new local character statements for 37 localities across the LGA which will define the existing and desired future character for built form, streetscape, landscape and heritage.

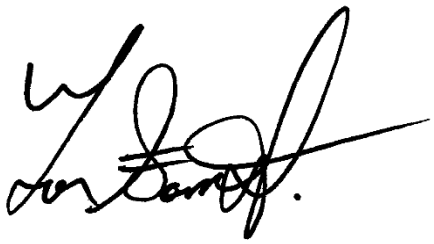
Urban Taskforce is of the view that these measures are clearly being put in place to effectively sterilise these areas from any form of development and should be removed.

Conclusion

Urban Taskforce Australia urges Northern Beaches Council to prioritise the delivery of new housing supply to meet the needs of its growing and changing population. Council needs to be mindful that it does not burden developers with a range of additional costs that simply drive feasibility into the ground and results in less housing and declining affordability.

Should you wish to discuss any aspect of this submission further, please call William Hughes, Economist and Planning Analyst on 0418 286 530 or via email will@urbantaskforce.com.au

Yours sincerely



Tom Forrest
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