Friends of Narrabeen Lagoon Catchment



P.O. Box 845, Narrabeen NSW 2101

www.narrabeenlagoon.org.au

Andrew Pigott, Executive Manager Strategic & Place Planning Northern Beaches Council Civic Parade, Dee Why NSW 2100

October 11, 2019

Re: Local Strategic Planning Statement

Dear Andrew,

Thank Andrew for the presentation to our organisation on the Local Strategic Planning Statement (LSPS) and for putting natural environment at the top of the priorities in developing this Statement. From this we expect that the draft LEP will reflect these priorities and that there will be substantial controls to protect and enhance the natural environment.

Priorities

We approve the Priorities listed in the Local Strategic Planning Statement, especially Priorities 1 to 4 that have direct relevance for Friends of Narrabeen Lagoon Catchment.

We approve the listed principles and actions for each of the Priorities from 1 to 4.

It is really good that waterways and bushland have been conceptualised as assets because of the services they provide - cleaner air and water and scenic amenity. This level of acknowledgement of their importance is likely to help provide protection for the valuable biodiversity of those waterways and areas of bushland.

As council has recognised that the natural environment is a valuable asset, it will be imperative that the new LEP includes strict controls to protect the natural environment and provide the resources necessary to police these controls. It is also essential that Council ensure that these controls are implemented and not left to private certifiers engaged by developers.

Extra Housing

We are always fighting against urban development in the non-urban areas i.e. Metropolitan Rural Areas. It is good to see that the LSPS is targeting the current urban footprint plus Ingleside for extra housing but not planning for extra housing elsewhere.

The diversity of housing types is provided by a variety of housing density zonings. These zonings should not be compromised by more intense housing densities than the densities provided in the LEP. The natural bushland areas should not be seen as opportunities for extra housing or other types of intense development.

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The planning controls must encompass and link both the preservation of natural environment and the provision of a diversity of housing in the existing urban areas.

Infrastructure

Andrew, in your presentation, you stated that this Planning would ensure that the increase in population would not outstrip the provision of infrastructure. This has not occurred to date. There needs to be catch up before accommodating more people. We are not sure that the LSPS contains enough rigour to ensure that the increased housing would not outstrip the provision of infrastructure although some words to that effect are in the plan.

Council needs to obtain infrastructure commitments from state government departments before finalising the new LEP.

Exemption from State Policies

We note that the LSPS states that NB Council is seeking an exemption from State Policies in Metropolitan Rural Areas.

We sincerely hope Council can achieve obtaining an exemption for the Metropolitan Rural Areas from State Policies for seniors living and for boarding houses and for medium density housing. These areas are not suitable for those purposes even if there is a road through them because they are usually too far from public transport and the facilities found in urban centres. Metropolitan Rural Areas are often in high bushfire risk zones so egress for residents is likely to be very difficult and that causes unequitable strains on available resources that puts other residents and properties at risk.

If this exemption is not provided, then there are likely to be endless conflicts with developers seeking to put inappropriate housing into areas that often do not have the infrastructure required. These conflicts are expensive for Northern Beaches Council which means that all rate-payers in the Northern Beaches LGA are bearing the cost.

Yours sincerely,

Ron Patton, President