



Mr John McKee
General Manager
Ku-Ring-Gai Council
Locked Bag 1006
GORDON NSW 2088

Dear Mr McKee

Thank you for submitting Ku-Ring-Gai Council's Local Housing Strategy (LHS) to the Department.

The Department commends Council on preparing a robust evidence base to support its LHS, providing Council with an understanding of the current and future housing needs of the Ku-Ring-Gai local government area. We acknowledge that Council seeks to provide all new housing in the LGA by utilising capacity under existing controls.

I can confirm that I have approved Ku-Ring Gai's Council's LHS, dated December 2020. My decision reflects the analysis undertaken to comply with the comprehensive strategic planning framework and the evidence base to inform your LHS to deliver a minimum 3,000 dwellings for the period 2021-26.

In doing so, I have determined that:

- The LHS acknowledges the need for housing supply, including the 6-10 year housing target, however commitment to identifying future growth areas is required.
- The LHS addresses the need for housing diversity, although commitment to further actions for delivery are required.
- The LHS addresses housing affordability, although commitment to further actions for delivery are required.
- The LHS is generally consistent with Section 9.1 Directions and SEPPs.
- The LHS is consistent with the North District Plan, subject to the requirements identified below.

My approval of the LHS is subject to the following requirements:

1. Council is to submit the planning proposals for the Lindfield Village Hub and Roseville Memorial Club to the Department for finalisation by December 2021. Timely progression of these planning proposals is considered necessary to support contributing to Council's 6 to 10 year housing target.

2. Consistent with Priority K3 of the Ku-Ring-Gai Local Strategic Planning Statement (LSPS), Council is to commence a masterplan, or accommodate proponent-led planning proposal(s) with good planning outcomes, for Gordon, Lindfield and/or Turramurra local centres. Planning proposal(s) for these centres are to be submitted to the Department for Gateway determination by December 2022. Where this work is not pursued by Council the Department welcomes good place-based approaches by landowner/developers.

This approach is consistent with the priorities and actions of Council's LSPS. These planning proposals are considered necessary to support the supply and delivery of housing over the medium term and present opportunities for new housing typologies (including affordable housing) suited to the future and changing needs of the community.

3. Council or proponents for the planning of these local centres is to consult with Transport for NSW to best address transport and road/pedestrian safety issues. Specific consideration should be given to the intersections of the Pacific Highway with Ray Street, Kissing Point Road, Rohini Street and Turramurra Avenue when planning for the local centre of Turramurra.
4. Consistent with Priority K3 of the Ku-Ring-Gai LSPS, Council is to prepare a masterplan, or accommodate a proponent-led planning proposal with good planning outcomes, for the St Ives local centre. Planning is to occur in consultation with TfNSW and align with its Movement and Place Framework.

Subject to TfNSW advice, the planning proposal is to be submitted to the Department for Gateway Determination by December 2022. This proposal will help to create future housing capacity to contribute to medium supply and support the longer term 20-year strategic housing target for the District.

5. A locally specific medium density complying development model as an alternative to the Low Rise Medium Density Housing Code is not supported. Council is to consult with the Department's Planning System Policy division to discuss alternative options to achieve the desired objectives of this approach.

One option should Council wish to exclude limited areas from the Low Rise Housing Diversity Code (LRHDC), is to seek to apply the forthcoming local character areas in Council's LEP. Council will need to provide a comprehensive evidence base in relation to the delivery of medium density housing (see advisory notes for more detail). This should include:

- a. Historical and forecast supply of medium density housing, including statistics on range of housing types approved over the last five years (DA and CDCs) and anticipated future take up rates.
- b. Include recommended controls outlined in LHS for medium density in implementation plan, including status and timeline for implementation.

The application of local character areas in LEPs is subject finalisation of the draft standard instrument clause for Local Character Areas.

6. Council is to commit to a work program to identify areas for additional medium density housing opportunities outside of primary local centres such as Roseville, Roseville Chase, Killara, Pymble, Wahroonga, West Gordon and North St Ives as identified in the Ku-ring-gai LSPS for potential delivery in the 2031 to 2036 period. A planning proposal(s) for these centres is to be submitted to the Department for Gateway

determination by December 2023. Where this work is not pursued by Council the Department welcomes place-based approaches by landowner/developers to explore opportunities for additional medium density housing in locations that are well served by transport, services and facilities.

7. Council is to update its implementation plan to provide specific actions in relation to its commitment to review controls for accessible and universal housing, and the resultant potential supply, including consultation with the community and housing providers to understand the suitability of controls and their implementation, particularly in the context of an ageing population.
8. 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 establish targets for seniors and medium density housing to determine whether future changes to the LEP and/or DCP are required to incentivise or encourage housing diversity and diversity of housing typologies. This should also consider the remaining capacity in the R3 Medium Density Zone, anticipated take up rates, investigating the potential to introduce dual occupancies to the R2 Low Density Zone and targeted community consultation to understand any barriers to development. A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to meet Ku-Ring-Gai's housing needs over the medium to long term.
9. Council is to update its implementation plan to reflect the requirements of this approval within four-six 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 Ku-Ring-Gai's Housing pipeline.
10. Council is to prepare an Affordable Housing Contribution Scheme that commits Council to examining the feasibility of levying affordable housing contributions for any new planning proposals that would result in development uplift or an increase in land value.
11. The direction and strategic planning approaches endorsed in State-led precinct plans are to prevail in the event of any inconsistency with this approval and/or the Council's LHS (as revised and current).
12. Council is to update or revise the LHS to inform its LSPS following the making of a future District Plan.

Any planning proposals for new housing development will be assessed against Council's LHS, the requirements above and advisory notes attached. Any State Government policy changes that may occur in the future are to prevail in the event of any inconsistency.

Implementing your Local Housing Strategy

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 planning work Council commits to undertake to implement its LHS, and should include but not be limited to:

- Implementation of a review system in achieving the LHS.

- Establishment of housing targets for medium density and seniors housing to determine whether future changes to the LEP and/or DCP are required to incentivise or encourage housing diversity and diversity of housing typologies.
- Specific actions relating to Council's commitment to review controls for accessible housing, including consultation with the community and housing providers to understand the suitability of controls and their implementation.
- The preparation of an Affordable Housing Contribution Scheme.
- Submission of planning proposals for the Lindfield Village Hub and Roseville Memorial Club to the Department for finalisation by December 2021.
- Masterplans for Gordon, Lindfield and/or Turramurra local centres and submission of corresponding planning proposal(s).
- Commitment to work with TfNSW to prepare a masterplan for the St Ives local centre to align with the Movement and Place framework.
- A work program to identify areas for additional medium density outside of primary local centres such as Roseville, Roseville Chase, Killara, Pymble, Wahroonga, West Gordon and North St Ives as identified in the Ku-ring-gai LSPS.

Local Housing Strategy Reviews and Updates

A review and update process will provide an opportunity to align Council's LHS and LSPS Statement, together with the housing targets and diversity outlined in the District plan, ensuring a cohesive strategic planning framework is in place for Ku-Ring-Gai LGA.

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.

We strongly recommend that council also review and revise (where required) its LHS before the LSPS is required to be reviewed by the Greater Sydney Commission. This will help best inform the next update to the LSPS.

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 this letter of approval and advisory notes.

Should you have any further questions, please contact Amanda Harvey, Executive Director, Local Strategies and Plan Making on 8275 1128.

Yours sincerely



Brett Whitworth
Deputy Secretary
Greater Sydney Place and Infrastructure

16 July 2021

Encl: Advisory Notes



Ku-ring-gai 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
General	
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">• The implementation of a monitoring review system and establish housing targets for medium density and seniors housing to determine whether future changes to the LEP and/or DCP are required to incentivise or encourage housing diversity and diversity of housing typologies.• Specific actions relating to Council's commitment to review controls for accessible housing, including consultation with the community and housing providers to understand the suitability of controls and their implementation.• The preparation of an Affordable Housing Contribution Scheme.• Submission of planning proposals for the Lindfield Village Hub and Roseville Memorial Club to the Department for finalisation by November 2021.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<ul style="list-style-type: none"> • Masterplans for Gordon, Lindfield, Turramurra and St Ives local centres and submission of a planning proposal(s) to the Department for Gateway Determination for one or more of these by or before December 2022. • A work program to identify areas for additional medium density outside of primary local centres.
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 informed by the housing demand analysis provided in Figure 1-5 on Page 18 of the LHS.</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. 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"> • Strategic merit and case for change • Robust demographic evidence • Demand analysis and economic impacts • Infrastructure delivery and funding to be borne by the proponent • Stakeholder consultation and outcomes • Sustainability and resilience • Social and affordable housing contribution
Community and Stakeholder Engagement	Outline and incorporate findings of exhibition of LHS as well as relevant community and stakeholder engagement.
Consultation and engagement with agencies	<p>Council is to continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW in relation to a rapid bus corridor between the Northern Beaches and Chatswood and the preparation of a master plan for St Ives local centre. • DPIE in relation to place-based planning for local centres



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Interdependencies with relevant local evidence base	Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS.
Data	
Clarification of 6 to 10 year and 10-20 year housing target	<p>Revisions to the LHS should provide a breakdown of how the 6 to 10 year target will be achieved, including when and where anticipated supply will be delivered and explain market take up rates.</p> <p>Council should ensure that all population and dwelling forecasts are cross-checked against the most recent 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 variations in dwelling forecasts.</p> <p>The Department has identified that progression of planning proposals for proposals for the Lindfield Village Hub and Roseville Memorial Club to the Department are necessary to assist in the supply and delivery of Council's 6 to 10 year housing target. In this context, Council should submit these planning proposals to the Department for finalisation by November 2021.</p>
Dwelling Diversity	
Affordable Housing Contribution Scheme	<p>Council's LHS evidence base is considered sufficient to justify the preparation of a SEPP70 affordable housing contribution scheme. An LHS condition of approval is included for Council to prepare a scheme that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management.</p> <p>Action 18 of the North District Plan requires Council to prepare an affordable housing contribution scheme. The scheme would be prepared in advance of any out-of-sequence planning proposals and sends a critical signal to the market regarding Council's strategic planning intentions with regard to affordable housing provision. It will also commit Council to examining the feasibility of affordable housing contributions for all new proposals that are likely to result in an uplift of land value. If feasible and appropriate, affordable housing contributions would be required by LEP provisions that implement the contributions scheme.</p> <p>The scheme should be prepared in accordance with the Greater Sydney Region Plan key parameters for successful implementation of Affordable Rental Housing Targets and the NSW Government's <i>Guideline for Developing an Affordable Housing Contribution Scheme</i>.</p>