



Submission to NSW Metropolitan Strategy Review from Northern Sydney Regional Organisation of Councils (NSROC)

May 2010

BACKGROUND

The Northern Sydney Regional Organisation of Councils is comprised of seven councils (Hunter's Hill, North Sydney, Willoughby, Ku-ring-gai, Ryde, Hornsby and Lane Cove) in the northern part of Sydney which have voluntarily come together to address regional issues, work co-operatively for the benefit of the region, and advocate on agreed regional positions and priorities. All of these councils work closely with their communities to ensure that planning for growth within the region is sustainable and recognises the social, economic and environmental needs of the community.

EXECUTIVE SUMMARY

The NSROC councils welcome this review of the 2005 Metropolitan Strategy (2010 Review) concurrent with the development of the Metropolitan Transport Plan as it provides a first time opportunity to demonstrably integrate land use and transport planning. All of the NSROC councils have worked closely with the Department of Planning in the Metropolitan Strategy process and in the development of the sub-regional plans. We welcome the opportunity to provide further comment on the process to date.

Key recommendations from NSROC are:

- The Strategy must recognise the fundamental importance of land use planning and transport coordination.
- The Strategy must be integrated with the Metropolitan Transport Plan but also interlinked with the State Infrastructure Strategy and the State Plan.
- The Strategy should set out short, medium and long term objectives and an action plan.
- The review of the Strategy needs to audit performance against the actions and targets listed in the 2005 Metropolitan Strategy.
- The Strategy must be consistent with, and structured, around the principles set out in the Federal Government Criteria for Capital Cities Planning.
- The Strategy needs to articulate funding mechanisms and delivery mechanisms.
- The Strategy must set out additional objectives and actions for developing the Sydney's global economic arc and growth centres.
- The Strategy must articulate the specific roles and functions of the proposed Sydney Metropolitan Development Authority prior to seeking comments from local government.
- The Strategy must take into consideration current Local Environmental Plan revisions and Community Strategic Planning Processes being undertaken by local councils to avoid conflicting plans and disconnected processes.

STRUCTURE OF NSROC SUBMISSION

The NSROC submission has been compiled by NSROC with the assistance of senior management and planning officers from our member Councils. Given the timeframes for responses the submission focuses on key strategic issues.

The submission is in 3 parts.

Part 1 - General Comments on the Metropolitan Strategy and 2010 Review

Part 2 - Responses to 10 Directions of the Metropolitan Strategy and 2010 Review

Part 3 – Recommendations relating to the NSROC area

A NSROC submission responding to the Metropolitan Transport Plan has been developed which should be examined in conjunction with this submission.

The submission also draws on the views of NSROC Councils as expressed in other documents including:

Appendix 1 - the NSROC Northern Sydney Sub Regional Planning Strategy 2006-2031 (May 2007);

Appendix 2 - the NSROC submission to the Inner North Sub Region Draft Sub-regional Strategy (September 2007);

Appendix 3- the NSROC Submission to the North Sub Region Draft Sub-regional Strategy (January 2008); and,

Appendix 4 - the NSROC Submission to the Independent Public Transport Inquiry (October 2009).

PART 1 - GENERAL COMMENTS

The 2005 City of Cities Metropolitan Strategy (2005 Metropolitan Strategy) was a ground breaking strategic document for NSW. It created subregions and it determined a hierarchy of centres which recognised the variety and diversity of the Sydney's built environment and its people. NSROC Member Councils supported the general proposal for increased density around city centres and transport hubs and accepted its proposals for tackling affordable housing.

The draft sub-regional strategies that underpinned the 2005 Metropolitan Strategy also set Councils specific housing and employment targets for their region. NSROC councils accepted their share of responsibility for meeting future housing and employment needs and have since integrated these targets in the ongoing development of their Local Environmental Plans.

As noted in NSROC's earlier submissions to both the North Subregion and Inner North Subregion Draft Sub-regional Strategies released in 2007 and 2008, NSROC has concerns about the appropriate **integration of infrastructure plans, particularly transport.**

Consequently the 2010 Review's proposal to integrate the Metropolitan Strategy with the Metropolitan Transport Plan is a welcome extension to the 2005 Metropolitan Strategy. However NSROC believes this integration would be more effective if other key infrastructure components were also incorporated such as health and education facilities, energy and communication utilities and water infrastructure which are articulated in the **State Infrastructure Strategy** and the **State Plan.**

Unlike the 2010 Transport Plan, the 2005 Metropolitan Strategy did not differentiate **short, medium or long term objectives or actions.** This was also raised by NSROC in their earlier submissions.

A revised 2010 Metropolitan Strategy must be linked and prioritised on the basis of the Transport Plan program rollout. Transport corridor and land use priority decisions should be complementary and their rollout must be synchronised to maximise cost efficiencies and general community benefits. For example the congestion and transport difficulties in the North West and South West Growth Areas are a direct result of the failure to deliver the promised complementary rail infrastructure. Such lack of coordination continues to frustrate the liveability, functionality and economic potential of this region.

NSROC has several transitional concerns about the connection between the information set out in the 2010 Review document and the 2005 Metropolitan Strategy.

- The 2005 Metropolitan Strategy set out specific “Aims” and multiple and detailed “Actions”. The 2010 Review has briefly noted progress against the “Aims” but the Review does not report against any of the 2005 Metropolitan Strategy “Actions”. NSROC is concerned about this failure of continuity in the review process and feels the **revised Metropolitan Strategy must include an audit of the 2005 Actions, particularly the 105 that are contained within the City of Cities Plan.**
- The 2010 Review should also aim to have alignment of regional area boundaries and reflect recent developments in planning reform. For example it is not clear how the **Growth Centres and Sydney’s “global economic arc”** fit in the 2010 Review and how the supporting Departmental divisions will align to deliver of those concepts and their objectives. Also the Department’s Sub-Regions are not **consistent with the boundaries** of the newly introduced Joint Regional Planning Panels (JRPPs). This lack of consistency undermines the Departments and Councils capacity to deliver the sub-regional and overall Metropolitan Strategy outcomes.
- **Since 2009** Councils have been consulting with their communities about strategic issues and needs through the **Community Strategic Planning (CSP)** Process prescribed by the NSW Division of Local Government. It is important that this process and its outcomes are informed and are aligned with the State and Federal strategic planning. CSP is an ongoing process as Councils are at various stages of consultation. NSROC would like clarity about how the Community Strategic Planning information that is gathered by councils will be integrated into the Metropolitan Strategy.
- Councils are also at various stages of **LEP development** which revolve around historic targets for housing and employment set in the 2005 Metropolitan Strategy and Sub –Regional Strategies. More information is required on how Councils are expected to capture variations arising from the evolving Metropolitan Strategy (2010 review) and Transport Plan into their LEPs.

In terms of **implementation**, the 2010 Review does not articulate **funding mechanisms** or **delivery mechanisms** to make the Strategy become reality. NSROC believes that structural and financial reforms must accompany the Strategy along with a system to discipline the delivery of its promises. A key part of the 2005 Metropolitan Strategy was articulation of actions and measurement of performance and reporting in accordance with the seven sub-strategies for both Councils and the State Government. Whilst Councils continue to be closely monitored by the state and by local communities and are now compelled to deliver four year operation plans and ten year financial plans this has not occurred at a state level.

NSROC believes that the most critical element to ensuring delivery of the Metropolitan Strategy is for the whole of government to be accountable for its delivery and to have a clearly enunciated public reporting responsibility with publicly identified performance indicators, budgets and milestones. Whilst this has been attempted in a limited fashion through the State Plan it has not been attempted in the Metropolitan Strategy and the five performance measurements provided in the discussion paper are superficial in this regard and the veracity of the reporting against several of the benchmarks such as Strengthening Economic Competitiveness is likely to be closely questioned.

Finally, the 2010 Review briefly notes the Federal Government's "**Criteria for Capital Cities Planning**" that sets out the standard of capital city strategic planning that may be tied to the allocation of Federal financing for major infrastructure in capital cities. NSROC believes these criteria need to be articulated and incorporated into the revised Metropolitan Strategy. Sydney's planning directions and regime must be structured consistently with these Federal criteria so that coordination of funding from State and Federal governments can be maximised. As part of this submission, NSROC has suggested how the Review's "10 State Government Directions" might match against the proposed Federal Capital Cities Planning criteria.

PART 2 - RESPONSES TO SPECIFIC QUESTIONS RAISED IN REVIEW

DIRECTION 1- Planning for a growing population.

By 2036 Sydney will need to accommodate 6 million people.

1A Should Sydney continue to accommodate the majority of population growth in NSW? What are the alternatives?

The ultimate distribution of population between Sydney and NSW will be primarily influenced by State and Federal factors such as land release and economic growth rates as well as specific policies on immigration and settlement. The need for planning for a growing population is part of the Federal Government's Capital Cities Criteria (Criteria 4a) noting population growth is a nationally significant issue.

NSROC councils have endorsed the previous population, housing and employment targets of the 2005 Metro Strategy and have been responding to these targets in their planning instruments.

Ideally the population of Sydney should be that which delivers a desirable level of amenity to its residents based on acceptable benchmarks for the provision of services, accessibility, transport effectiveness, economic and environmental sustainability and housing affordability. Given such benchmarks, it may be the case that the population of Sydney reaches a critical point. For this reason the Metropolitan Strategy must be looked at in concert with policy on population in NSW regions. It should not be assumed that the projected rate of population increases noted in the 2010 Review is fixed and it is beyond the scope of the Metropolitan Strategy to influence the size and location of additional population growth on a metropolitan scale. It may well be that a mix of new policy initiatives or strategies which locate population growth outside of the Sydney Basin is needed as well as initiatives which accommodate accommodation growth within Sydney itself.

DIRECTION 2 - Making Sydney climate change ready

Address the vulnerability of Sydney to a changing climate and a carbon constrained future.

2A What land use responses will help Sydney mitigate, and adapt to climate change?

2B How can the planning system help Sydney adapt to the impacts of climate change?

2C How can planning in Sydney be improved to boost water, fuel, energy and waste efficiency?

2D How can we bring more green and open spaces into our communities?

The Federal Government is also recommending that capital city planning specifically address climate change mitigation and adaptation (Criteria 4c).

Adaption and mitigation planning should be included in the revised Metropolitan Strategy. The 2007 NSROC Northern Sydney Sub Regional Strategic Planning Strategy also identified five broad environmental sustainability policies which capture environmental concerns associated with climate change (see Appendix 1).

NSROC feels that State government could enhance its existing environmental policies and planning systems to improve Sydney's capacity to be climate change ready. Some suggestions include:

- extend BASIX to commercial development and add additional incentives for development to go higher than the minimum BASIX requirements;
- apply greater compliance on State government agencies and State owned utilities to meet State energy and greenhouse gas reduction targets;
- apply binding obligations or penalties on utilities to reduce waste and unsustainable practices such as water leakages in Sydney Water infrastructure system;
- take further action on waste management by fostering the development of alternative waste technologies and implementing a national packaging covenant;
- provide incentives in the planning system through the exempt and complying development for the uptake of co-generation initiatives and other alternative energy options solar, wind etc; and
- ensure consistency in approaches to environmental management across NSW government agencies. For example the recent DECCW reforms guidelines on coastal development are not consistent with DoP's Coastal Development SEPP

NSROC is very concerned about progress of open space acquisition through the Sydney Region Development Fund which was dedicated to this purpose. Councils have contributed millions of dollars towards this fund yet little additional regional open space has been provided to serve the northern region of Sydney. A targeted program that is equitably distributed back to the regions that have contributed to the fund needs to be developed. This should initially be focused on acquiring additional open space for active recreation purposes to meet the increased demand for sporting facilities generated by increased population projected under the Metropolitan Strategy.

In relation to broader climate change initiatives, the Metropolitan Strategy could foreshadow a process to work with Councils or ROCs on energy, water and waste reduction for each local area/community to establish targets, action plans and funding sources. For example, Willoughby City has adopted targets for 50% reduction in its own Council green house gas emissions by 2010 and a 15% reduction in community green house gas emissions by 2015. Not all areas should be the same but regional programs could be developed to set realistic targets based on community awareness of the issues, funding and Council resources.

DIRECTION 3 - Integrating land use with transport

Get best value from investment in transport infrastructure with integrated land use planning

- *3A What is the best use of land within walking distance of stations and bus stops?*
- *3B How can we make our city better for pedestrians, cyclists and public transport users?*
- *3C How can we reduce the need for people to travel as far or as often?*

The Federal government has identified that capital city strategic planning must be integrated and provide a consistent hierarchy of plans that are publicly available which prioritise projects over various timeframes (Federal Criteria – 1a, 1b, 2b, 2c,). As noted in NSROC general comments, the 2010 Review does not identify timeframes for the planning objectives. Criteria 3 of the Federal

Government's requirements also seeks capital cities to identify key nationally significant infrastructure such as transport corridors, international gateways, intermodal connections, major communications and utilities infrastructure, and reservation of land for future expansion.

NSROC has consistently argued that there is no single answer for the best use of sites adjacent to transport infrastructure. Effective master-planning and funding processes are required for each site to reflect specific attributes of the surrounding community. Consideration must be given to topography, commuter parking, and adjacent services such as retail, health or education facilities etc. Transport infrastructure planning must capture both local needs and wider integrated network concerns.

Most importantly, in order to get best value from investment and best outcomes for residents, State infrastructure bodies must cooperatively engage with local government in such master-planning processes. A disturbing trend is for the State Government to delineate arbitrary distances from centres or transport nodes and mandate density within the proscribed area. This was also identified as a theme in the Metropolitan Strategy Review stakeholder workshops held on 9 April 2010 which posited medium density being proscribed around small centres. Such one-size-fits-all approaches do not provide for considered outcomes nor do they recognise the heterogeneity of built form, existing infrastructure and topography in Sydney. Specifically such approaches do not address the inherent disfunctionality of the state agencies with a transport function in brokering transport solutions at a service level (such as integrated ticketing) or a infrastructure level (such as the failure to deliver on the majority of the bus corridors).

NSROC councils have found that many transport agencies fail to consult and work cooperatively to develop transport infrastructure changes with the relevant councils. For example the poor design and operational failings of the Chatswood Bus Interchange, which has now been found to be unable to cater for current and future bus services, is indicative of inability of government infrastructure providers such as TIDC and the STA to properly and co-operatively plan for transport services.

It should be noted that as pedestrian and cycling rates increase, shared paths can pose risks. Ideally cycling and pedestrian paths should be separated. However some Council are limited by topography and finances as to the form of pedestrian and cycling facilities that can be provided. Large scale joint state and federal funded access ways that target key commuter routes with separate pedestrian and bicycle paths would make the city better for pedestrians and cyclists. Further initiatives for improving pedestrian, public transport and cycling rates include:

- cycling friendly facilities on public transport;
- secure bicycle storage at intermodal transfers;
- demand management parking controls to limit employee parking around centres with good public transport in order to promote public transport use;
- increase incentives for complementary cycling facilities or car share schemes in new developments; and
- encouragement of green star work travel plans; and
- better use of freeway and rail corridors to incorporate regional cycle routes.

Where significant investment into public transport does occur, such as in Macquarie Park, the very tangible integrated transport benefits can be realised such as Optus's current 50/50 modal split which is predicated on the new Macquarie Park train stations, careful planning, corporate responsibility and active engagement by council, state agencies and the business community. Such innovative solutions should include the possibility of development incentives where the public benefits of an integrated transport solution by a developer are clear and tangible.

DIRECTION 4 - More jobs in the Sydney Region.

- *4A Where should we reserve future employment land?*
- *4B How can we maintain and revitalise older industrial sites in established areas?*
- *4C What initiatives can boost the success of future employment lands?*
- *4D How can we ensure sufficient retail and commercial space to support economic growth?*
- *4E What economic development incentives might attract businesses and increase jobs?*

The Federal Government has identified that national significant issues of productivity and global competitiveness, and connectivity of people to jobs and businesses to markets (Criteria 4b and 4e) should be captured in capital city strategic planning.

NSROC sees that while there is increased need for housing to address population growth, this should not come at the expense of designated commercial space and industrial zoned land. The disparity between the profitability of residential development versus commercial/ office/industrial development means that Councils face considerable pressure to rezone commercial development sites to residential. However if this trend continues local and sub regional employment and economic capacity will be compromised. This in turn exacerbates transport demand and travel to work issues, which from a sustainability perspective, must be minimised.

A specific NSROC concern is the current conflict occurring in centres such as Chatswood and St Leonards where residential developers are seeking to exploit the Part 3A provisions to develop sites for housing to the exclusion and loss of sites planned for employment growth contrary to the Metropolitan Strategy.

Some other actions which NSROC believes could improve local and regional economic viability include:

- removing the parking levy which applies to North Sydney and Chatswood CBDs. This levy is a distortion that favours retail development and acts as an uncompetitive disincentive for commercial office developments in those centres seeking office employment compared to centres such as Macquarie Park that do not have the levy. If the levy is to remain then the funds must be distributed back to the centres that have contributed the levy so that that additional funding can be directed to public transport improvements. For example, the levy in Chatswood CBD could be allocated to fund an upgrade of the bus interchange which has been found to be under sized since its opening in 2008;
- removal of payroll tax for targeted businesses such as creative industries would act as a new incentive for start ups;
- active encouragement of business clustering through state agencies such as DSRD and the Department of Commerce;
- the ability to leverage sufficient development contributions to sustain significant public domain initiatives to stimulate vibrancy, enhance retail and leisure experiences and attract and retain key workers;
- provision of flexibility in land use planning instruments to allow local government to incentivise and tailor commercial development around a business cluster theme and;
- improved coordination of major utility roll outs in commercial areas.
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A key element in attracting business to a region is the certainty of appropriate and timely infrastructure development. The Metropolitan Strategy review must recognise the synergies in infrastructure development and economic growth. For example businesses are attracted to areas with reliable broadband and power and access to rail or road for freight movements.

DIRECTION 5 - Growing Sydney's value.

- *5A What are the ways of facilitating diverse employment and supporting jobs in new and existing centres?*
- *5B How can we attract diverse employment and new jobs in Western Sydney?*
- *5C How do we encourage affordable places for small and creative businesses?*
- *5D How do we enhance Sydney's role as a Global City?*

The Federal Governments Strategy planning criteria invites City planning to address productivity and global competitiveness, connectivity of people to jobs and businesses to markets (Criteria 4b and 4e).

The 2005 Metropolitan Strategy has a strong focus on the “global arc” representing an integrated transport, employment and business activity corridor through key business precincts around Sydney.

Projects such as the Epping to Parramatta Rail Link are critical for the development of the arc by linking workers to employment areas between the West, North West and Northern Sydney. The partial completion of this project (Epping to Chatswood only) is a fundamental constraint on jobs and businesses in these existing areas. In the NSROC region 50 per cent of the workforce travels from outside of the region including workforce travelling from Western Sydney. It is critical for all of Sydney’s development that projects which enhance the development of the arc have priority.

Some further measures which can assist smaller business are introducing planning reforms for start up businesses. NSROC Councils believe that greater flexibility in exempt and complying requirements would assist start up businesses.

In terms of enhancing Sydney as a “Global City”, the Federal government proposes that capital city plans encourage world class urban design and architecture (Criteria 8). While Councils may not be involved in the development of large “icon” projects or buildings such as the Barangaroo development, they have a key role to play in delivering best practice local amenity and design. To truly develop a Global City, Councils must be supported through the planning process in the delivery of high quality urban residential design. The tools available to Councils to enhance the role of Sydney as a Global city are limited to land use planning, public domain improvements and facilitating the interaction of specific business communities.

DIRECTION 6 - Strengthening a City of Cities

- *6A What is the best way to unlock the potential for growth in centres and areas within walking distance to stations and bus stops?*
- *6B How can the planning system support investment and jobs in new and existing centres?*
- *6C What features are essential to a vibrant centre?*
- *6D How do we ensure these features are incorporated into our planning?*

The Federal Cities Planning Criteria suggest that planning address issues of social inclusion and health liveability and community wellbeing.(Criteria 4h and 4g).

NSROC councils believe that community vibrancy can be developed through cooperative local and state government master-planning. For example quality master-planning processes can examine and ensure public squares have right level of community services to match local needs. This rarely occurs as part of the planning and design process for large projects and centres. The work of EPRA (East Perth Redevelopment Authority) through its Northbridge project is a good example of urban design [leading a redevelopment masterplan](#). Councils are concerned that State Government intervention

through Part 3A developments can compromise these masterplan visions. Care must be taken to ensure Part 3A developments complement and contribute to the overall plans for the centre.

Delivering masterplanned projects is the major challenge. Section 94 contributions from developers are capped and are constrained by focusing on new developments. Renewal projects, such as Main Street programs, attract less Section 94 source funds and Councils suggest a mechanism for developing special levies for public domain renewal of this kind may be required.

NSROC councils note that enhancing business or retail centres that have disparate ownership structures (such as main streets) requires more coordination than large shopping complex centres which have a centre management system. However large operators are generally seen to have less engagement with local communities and therefore less impact on community vibrancy. Planning tools which allowed councils to apply a centre management system for renewal and upgrade to smaller centres should be explored.

DIRECTION 7 - Meeting changing housing needs.

- *7A What housing types will we need in our local areas in the future? e.g. stand-alone or terraced houses, townhouses, tall apartment buildings, small blocks of apartments with shared gardens or big houses divided into two homes?*
- *7B Which areas are appropriate for higher density housing—such as apartments?*

The Federal Cities Strategic Planning Criteria recommends that capital city plans address housing affordability and future housing needs (Criteria 4i).

The State Government's Affordable Housing SEPP is a key document that attempts to encourage the provision of affordable housing by allowing for flexible housing types. However some development options provided through the SEPP, such as the capacity for the development of "granny flats", has had some unintended consequences.

NSROC councils have observed that the result of this option is random infill development. Unchecked growth through this process changes the demands on utilities, infrastructure and local community services and transport demand. Councils have developed specific housing strategies and complementary services that are based on predictable growth patterns rather than ad hoc growth. The fear is that these SEPP mechanisms can undermine and compromise local government strategic plans.

Councils are particularly concerned in the manner in which the Affordable Housing SEPP was introduced and the difficulty councils will have in the effective monitoring and control of its impacts. Whilst the intent might be laudable, over time the impacts in certain areas will be significant and residential resistance will significantly increase. One of the undertakings by the Department of Planning in the development of the Metropolitan Strategy was to provide greater certainty for residents regarding the character of the neighbourhoods in return for accepting increased density in centres. The Affordable Housing SEPP undermines this philosophy by providing for increased density everywhere however whilst this is unlikely to fundamentally address the issue of housing affordability it is likely to generate increased discontent within the community and hostility towards those who occupy the resultant dwellings.

With the population and urban renewal targets outlined in the Metropolitan Strategy review increased high and medium density housing will be required. Councils anticipate that the residents of such density will become more diverse. For example the number of families living in apartments is likely to

increase. This brings with it new challenges for design and planning and strata laws. The Metropolitan Strategy should attempt to examine how design and strata laws may need to be changed to fit the profile of future residents. NSROC councils also see a long term need for greater flexibility in rezoning and land title laws to allow effective redevelopment of large strata blocks. At present the manner in which the housing targets are compiled is not clear and repeated attempts by NSROC to fathom the methodology by which they were created with the Department of Planning have been unsuccessful. The Department of Planning did develop a Metrix tool a number of years ago to demonstrate dwelling capacity but this appears to have become defunct. NSROC recommends that this tool be revised and used to demonstrate how the housing targets have been modelled in each LGA.

NSROC is aware of work by the Property Council to propose a process for extinguishing strata schemes based on a lower threshold and adoption of a renewal plan. Such a scheme should be considered.

DIRECTION 8- Balancing land uses on the city fringe.

- *8A Should we continue to concentrate greenfields development in the Growth Centres?*
- *8B Should more be done to encourage food production in the Sydney Basin?*
- *8C To what extent should land on the city fringe be identified and protected for open space and conservation?*
- *8D How can the process of greenfield land release be improved?*

The Federal Cities Strategic Planning Criteria recommends that capital city's strategic plans provide for "planned, sequenced and evidence based land release and an appropriate balance between infill and greenfield development" (Criteria 6). Food security also cited as a consideration in the context of nationally significant policy issues (Criteria 4k).

NSROC notes the mix of 30% new green field housing and 70% infill housing proposed in the 2010 Review Discussion paper but it is understood that this mix has not been achieved.

NSROC councils believe that greenfield development in the North West Growth Centre should not be continued without immediate delivery of complementary public infrastructure. The development of the North West Growth centre was predicated on the provision of a North West rail service over 15 years ago. This has not been delivered. The expansion of this region in absence of core public transport has caused long travel times, congestion and pollution which in turn has negative consequences for the environment, business and local amenity. These negative consequences have spillover effects into associated regions such as NSROC. For further details on this matter see the NSROC submission to the Metropolitan Transport Plan (Part 3 of this Submission). The overarching principle for all growth centres should be that major public infrastructure including transport should precede any other development.

NSROC councils undertake various initiatives to encourage local food production such as community gardens in our more dense suburbs and perma-culture and home based food production in our semi rural districts. NSROC urges the State Government to include in the Metropolitan Strategy a direction to introduce planning, tax or other incentives to provide local food production in the metropolitan area.

Protecting land on the city fringe is a key issue in our region. Member councils Hornsby and Ku-ring-gai are bounded by large tracts of protected bushland and agricultural or semi-rural land. Greenfield developments, that fragment large parcels of rural land, cannot be reformed back into rural land. and for this reason lands should be protected because they may be a resource for future local agriculture purposes. The strategy should include actions to preserve existing land for agricultural purposes on the metro fringe.

DIRECTION 9 - Achieving Renewal

- 9A Which parts of Sydney would benefit from a new centre with shops, small businesses and public transport services?
- 9B How can we improve the design of public spaces and new buildings in existing areas?
- 9C What are the barriers to accessing key services in your local area?
- 9D What future uses, activities and services should be grouped in and around centres?

The 2005 City of Cities Metropolitan Strategy and its draft Subregional Strategy identified key retail and transport centres across Sydney. The centres were categorised into two broad groups - regional and local centres. NSROC recommends the 2010 Review categorise centres into a more detailed hierarchy which recognises the variety of centres. A particular anomaly is the classification of Chatswood as a major centre when its key centre characteristics are well above other major centres. Guidelines on Centres from Department of Planning would be valuable for councils to address economic promotion, urban design, centre management transport and accessibility.

NSROC councils have pursued or plan to pursue development of these identified centres from the 2005 Metropolitan Strategy. Within the NSROC/SHOROC region there are a number of centres that would benefit from being redeveloped. However there are also as well as a number of centres which have further development potential that are yet to be realised due to a lack of funding, lack of consolidation of lots and poor accessibility. For example a recent masterplan process for the Northbridge Centre in Western Australia was discontinued, in part, due to the cost of land consolidation, resolution of existing leases and availability of capital for redevelopment.

To maximise benefits and minimise costs, NSROC Councils have generally focused on reinvigorating existing centres. Also Councils have found that the creation of new centres in existing areas generates significant community opposition.

Council have invested considerable energy and resources into designing public spaces (sometimes in partnership with landowners) in existing areas. However more significant contributions from Section 94 and VPA processes would assist higher quality outcomes.

NSROC Councils suggest retaining, enhancing and a revising of SEPP 65 and development an equivalent of SEPP 65 for commercial, mixed use premises would assist councils to improve the design of centres and non residential buildings.

Key services that should be grouped around centres include transport, community services and open space. NSROC agrees that further urban renewal must be undertaken and around centres. However complementary **social and open space** planning in these locations must be a key priority for urban renewal to be effective and deliver on its promise. This is a challenge because councils are finding social amenity and open space is already over utilised with existing population densities. With concerns about ageing and health outcomes, the provision of adequate activity recreation areas is very important. For example, the NSROC region already has a shortage of sportsground for those currently living and working in high density areas. This demand will be exacerbated further by urban renewal over time. The Metropolitan Strategy should contain a specific action to identify how and where additional regional and district active recreation areas will be provided.

DIRECTION - 10 Implementation

- 10A What should be the key characteristics of an urban renewal authority (e.g. Sydney Metropolitan Development Authority)?
- 10B What legislative and planning tools should be available to such an authority?
- 10C What indicators should we use to measure the success of our Metropolitan Plan?

NSROC councils believe that governance structures, financing and whole of government integration are key factors for the implementation of a revised Metropolitan Strategy.

A critical part of implementing the revised Metropolitan Strategy is to measure what has been achieved against the 2005 Metropolitan Strategy. As NSROC has recommended, an analysis of what actions have and have not been implemented and why is required prior to adopting a revised 2010 Strategy. A further issue is the finalisation and endorsement of the draft Subregional Plans.

NSROC councils believe that a strong commitment at Cabinet level with accountability and buy in from Treasury and a supporting funding regime is paramount for the Metropolitan Plan to be effective. A mechanism for coordination and guaranteeing delivery is required to ensure that the Metropolitan Strategy is implemented. If a new organisation or authority is to be instituted at State level it would have to have the following qualities:

- Clear Terms of Reference - which are exhibited for public discussion prior to establishment
- Transparent operations including milestones and KPIs
- Statutory public consultation obligations
- Cross-sectional representation including local government
- Limited rezoning, land acquisition powers and reselling restrictions
- Any profit generated should be invested into public infrastructure and facilities
- Need to satisfy constitutional and legal requirements
- Should report to Parliament

Based on the information available, the proposed Sydney Metropolitan Development Authority does not serve this purpose. NSROC opposes the current concept of the Authority which appears to assume land planning controls without any safeguards for community and local government consultation. At a governance level it appears to have no cross representation of other agencies or levels of government. At a planning level there is a complete disconnect from regional planning and Local Environmental Planning. Further debate on this proposal cannot proceed until more details are provided.

In measuring the future success of the Metropolitan Strategy NSROC recommends that the following five factors be taken into consideration:

- 1- Transport - increased public transport patronage, reduced travel times and congestion
- 2- Economy - improved Gross Sydney Product, increased employment opportunities, housing affordability
- 3- Sustainability –key improvements in environmental measures such as lower emissions and pollution levels, lower water and energy use,
- 4- Community Amenities – improved safety and health levels and social cohesion and vibrancy, maintenance of open space to population ratios, and
- 5- Governance and finance – profitable returns on projects for the government, and performance against transparency indicators

In addition to these specific measures, the Metropolitan Strategy should provide effective implementation mechanisms as prescribed in the Federal Government's Capital Cities Planning Criteria (Criteria 9). These requirements are :

- a) clear accountabilities, timelines and appropriate performance measures;
- b) coordination of between all three levels of government ;
- c) evaluation and review cycles; and
- d) appropriate engagement and consultation.

11 What else?

- *11A What top three issues or geographical areas should the next Metropolitan Plan particularly focus on? Why?*
- *11B Do you think the ten proposed directions above are the right way for Sydney to head towards 2036?*

NSROC has identified several top issues which require focus in this review process including the following:

1. The determination of the location and timing of a second Sydney airport
2. The timely delivery of key public infrastructure – such as the North West and South West railway, and recommitment to the Epping to Parramatta Rail Link.
3. The identification of satellite cities and inter-regional transport links for future population growth – as an alternative to maximising growth in Sydney
4. The establishment of new cooperative governance arrangements to ensure that the Metropolitan Strategy is actually delivered,
5. The generation of cross government support and links with other key Government plans such as State Plan, State Infrastructure Strategy, and the Federal Capital Cities Criteria.
6. The creation of new funding mechanisms for infrastructure throughout the development cycle
7. The planning for climate change impacts in vulnerable NSROC areas

Whilst the 10 Directions provide a solid and commendable basis for moving forward, NSROC would like to see the revised Metropolitan Plan accompanied by a Project, Funding and Action Plan to match it.

The 2005 Metropolitan Strategy was subsequently followed by the release of Draft Sub-Regional Strategies which for the NSROC are included the areas of the North and Inner North. NSROC made submissions on these strategies to the Department and those comments on the draft documents remain current. However it is understood that the Department will release revised Sub-Regional Strategies following this review process and as that time NSROC will provide specific additional comments.

PART 3 – RECOMMENDATIONS RELATING TO THE NSROC AREA

Further to the proposals outlined above, the Northern Sydney Regional Organisation of Councils has the following specific recommendations and expectations in regard to the Metropolitan Strategy Review.

1. The 2005 Metropolitan Strategy be rewritten to incorporate and integrate the 2010 Transport Plan including but not limited to reconciling land use strategies, densities, centres policy, staging and funding that property respond to the constraints and opportunities arising from the Transport Plan for the Northern Sydney Region.
2. The centres hierarchy under the Metropolitan Strategy be revised to identify the Chatswood CBD as a Sub-Regional Centre instead of a Major Centre having regard to its characteristics which are distinguishable from other Major Centres and its role on the north shore of Sydney.
3. The Metropolitan Strategy address the capacity constraints of the Northern Region's infrastructure which is limiting growth and undermining liveability of some areas, specifically in energy supply, social services and active recreation facilities.
4. The Metropolitan Strategy foreshadow the necessity to revise the mechanisms for local and community infrastructure funding such as removal of rate pegging, use of innovative funding measures (tax credits, local infrastructure bonds, tied levies like the Sydney Regional Development Fund or the parking levy) or fixed, project based uniform levies.
5. The priorities set out in NSROC's Submission on the Metropolitan Transport Plan for transport improvements in the Northern Region be adopted in the Strategy.
6. The Metropolitan Strategy identify the long term locations for the siting of Alternative Waste Disposal Technology and for disposal of non-recyclable, non-reusable putrescible waste for Northern Region residences and commercial properties.
7. The Metropolitan Strategy propose the adoption of a consistent sustainable carparking policy for commercial centres, business parks and higher density residential development where there is access to public transport;
8. The Metropolitan Strategy include specific proposals to safeguard and promote the retention of agriculture on the metropolitan fringe that serves the fresh food needs of the Sydney basin.
9. The Metropolitan Strategy adopt a specific policy to give priority for promoting new business growth in the "global arc" where there is good access to transport and other infrastructure.
10. The Metropolitan Strategy identify an objective for State Planning and Housing agencies to confer with NSROC to develop a community supported, feasible and planned program for delivering new affordable housing projects.
11. The Strata Title legislation be reviewed to facilitate the redevelopment of strata properties subject to appropriate thresholds, compensation and consultation with affected parties;
12. The Metropolitan Strategy provide for joint State and Local Council plans to address the particular climate change implications for the NSROC area especially bushfire and flooding,

impact on the elderly and upgrades to the Region's ageing infrastructure that will be unable to cope with climate change.

13. The Metropolitan Strategy adopt a policy that all major transport corridors including the North Shore Railway, M2, Pacific Highway and Military Road be designed to incorporate separate regional cycle paths.

The matters raised in the foregoing Recommendations, once incorporated in a revised Metro Strategy, need to then be addressed in the Sub-Regional Strategies. NSROC is willing to work closely with the relevant Government agencies to implement a revised Metropolitan Strategy based on the recommendations in this submission.

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