

The Director General
Department of Planning
c/- Sydney Region East
Locked Bag No.8
REDFERN NSW 2016

28 September 2007

Dear Mr Haddad

Re: Sydney Metropolitan Strategy Sub-Regional Planning Process

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.

The NSROC councils welcome the Metropolitan Strategy process as it provides the necessary framework for growth in Sydney to be managed sustainably. In particular NSROC supports the development of sub-regional plans as an appropriate recognition of the complexity and diversity of the Sydney metropolitan region and the necessity to take a more specific and detailed approach.

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 comment on the process to date and the following pages highlight some of the concerns the NSROC councils have regarding key elements of the draft sub-regional strategies.

Yours sincerely



Clr Pat Reilly,
President
NSROC
(Mayor of Willoughby)

NSROC Submission on the Inner North Subregion Draft Subregional Strategy

September 2007

This submission has been prepared by NSROC in response to the draft Subregional Strategy titled "Inner North Subregion Draft Subregional Strategy ", dated July 2007. The Subregional Strategy is one of two to be released by the Department which covers the NSROC region as well as Mosman Council. The submission has been endorsed by the NSROC General Managers Group and the NSROC Executive.



WHAT IS NSROC?

Northern Sydney Regional Organisation of Councils (NSROC) is a voluntary organisation of local governments established to provide strong local government leadership; to work co-operatively for the benefit of the Northern Sydney region; and to effectively advocate on agreed regional positions and priorities. The councils under the NSROC umbrella are; Hornsby, Willoughby, North Sydney, Lane Cove, Ryde, Ku-ring-gai and Hunters Hill.

The NSROC councils are committed to the sustainable management of an area which covers nearly 700 square kilometres, and they serve a population of over half-a-million people. The region is home to a diverse collection of landscapes and communities, ranging from scenic waterways, bush land parks and areas of historical significance through to residential high-rise living and thriving commercial and retail centres.

NSROC has already provided comment on the first iteration of the Department of Local Government's strategic planning document for the Sydney metropolitan region titled "City of Cities". Concerns relating to the efficacy of the consultation process; the failure to pursue a partnership arrangement for the creation of the sub-regional plans; and the lack of firm and comprehensive infrastructure commitments have already been raised in relation to the over-arching strategic document and will not be re-examined in detail here. However the principal concern over the lack of infrastructure commitment beyond the time-frame contained within the current State Infrastructure Strategy will be discussed in greater detail.

Since the Metropolitan Strategy process commenced the NSROC councils have worked diligently to ensure that they were able to analyse data projections made by the Department of Planning (DoP) and contribute to the process of developing sub-regional plans. Up until late 2005 local government was charged with the responsibility of preparing the sub-regional strategies and it was with some disappointment that we were informed that the sub-regional plans will be developed, exhibited and owned by the DoP. In addition NSROC has been divided into two sub-regions, contrary to the former Director-General's explicit undertakings to recognise existing ROC boundaries.

Nonetheless, NSROC has provided a significant body of data to the DoP which highlights the anticipated impacts of significant urban consolidation in the region as well as identifying the key economic role the region plays in the state's economy. This data is contained within three reports commissioned by NSROC in 2004/05 which are:

1. The Economic Contribution of the NSROC Region (Centre for International Economics, December 2004)
2. NSROC Regional Social Report (Le Bransky, October 2005)
3. The Environmental Impacts of Population Growth on the NSROC Region (Noonan, October 2005)

Furthermore, NSROC initiated and recently adopted its own **NSROC Northern Sydney Sub-regional Planning Strategy for the period 2004 – 2031**. This Strategy identifies regional and council specific housing and employment targets at 10 yearly intervals for the period of the Metropolitan Strategy as well as identifying key infrastructure requirements and regional planning policies. This document has been exhibited by the NSROC councils and adopted by the NSROC Board and can be viewed at [XXXX](#). All of the above documents have been provided to the Metropolitan Strategy team and it remains our expectation that they will assist in the completion of the two sub-regional strategies which are being finalised for our region. They also provide a robust platform for consideration of some of the issues of concern contained within the Inner North Sub Regional Strategy which are discussed in greater detail in the following pages.

General Comments

NSROC welcomes the development of the Inner North Subregion Draft Subregional Strategy (INSDSS) and is willing to work in partnership with the government to not only finalise the strategy, but to ensure its effective implementation at local government level. The member councils also have available, or are willing to jointly undertake, appropriate research to determine the timing and location of growth as well as development capacity

While the NSROC area is an established area, it accepts its share of meeting the future housing and employment needs for the future growth for Sydney, provided clear outcomes and expectations are established and agreed. However this growth would best be accommodated within the existing developed footprint of the urban areas. Development should not result in reduction of existing bushland area (and consequent loss of biodiversity), loss of lands for public purposes (through reduction of Special Uses Land) and by ad hoc intrusion into identified agricultural land (resulting from conflicting planning policies).

While the NSROC area has a variety of transport services and other infrastructure, the expected population and employment growth require that the infrastructure needs of the area be identified and addressed if liveability and efficiency objectives are to be realised in a manner consistent with the principles of ecologically sustainable development. Significant concern remains regarding the scale and timing of infrastructure delivery as identified within the INSDSS.

The INSDSS it clear that councils are responsible for the allocation of land for dwellings and employment capacity within a pattern that achieves subregional Strategy targets and objectives. This approach is supported by NSROC as the NSROC councils are in the best position to undertake the detailed local planning required to cater for current and future population growth.

It should also be noted that the ongoing threat of the Minister using his powers under Part 3A for rezoning/redevelopment of particular sites that may undermine the objectives of the Strategy.

The primary objective is to set dwelling and employment targets for each local government area, which will be monitored, without secured State funding for infrastructure and transport plans and equal State government accountability for outcomes. Whilst Council supports the approach that local government be responsible for the location of new dwellings, the Draft Strategy has a number of limitations which are outlined in the comments below.

NSROC supports the direction of managing growth and valuing non-urban areas, and believes the Metropolitan Strategy should adopt a robust position regarding city sprawl. The Metro strategy needs to clearly state that achievement of a concentrated, rather than a dispersed pattern of future development is highly desirable for Sydney. The designated hierarchy of centres should be resisted so that they confirm to the Metropolitan Strategy.

Achieving the policy objectives of the Metropolitan Strategy will require a collaborative effort between sectors of government including the Federal Government. NSROC Councils look forward to working with each other and with all agencies of State government to create a more prosperous, liveable and sustainable Sydney.

Sub-regions

Subregional Planning provides the framework for the distribution and timing of new housing, and employment capacity targets in line with the vision for the Inner North Sub Region”.

Many areas of the region are under considerable pressure from development, in an environment of inadequate or aging infrastructure. For the NSROC local government areas to continue to contribute to meeting the demand of increasing population and contributing to the wealth of Sydney, the Metropolitan Strategy must recognise the issue. NSROC would like to see a more analytical approach taken to urban renewal, reflecting an approach based on set criteria and which acknowledges the need for urban renewal programs in regions outside of the ones presently identified.

For some years the State Government has promoted and implemented a policy of urban consolidation. The residential development strategies, while allowing local government to determine local strategies, were not a targeted or a co-ordinated metropolitan strategy. The success of urban consolidation is reflected in the dwelling creation statistics that show that 75% of new dwellings are created in established areas. However this intensification does have limits.

Just as the aim is that future Greenfield development should have a structured planning approach, urban renewal should meet the same rigid planning requirement. We should be creating communities that satisfy the criteria of an urban village and include: the provision of local employment opportunities, water sensitive urban design and energy efficiency across all aspects of the built environment, a range of housing types, affordable housing opportunities, accessibility to public transport, the provision of a range of open space and new approaches to conservation management.

Relationships with other State policies

The Metropolitan Strategy for Sydney was released in December 2005. It provided broad principles for growth within Sydney but did not specify targets for individual council areas. It states that growth across the ten subregions over the twenty five years to 2031 was to comprise:-

- 1.1 million new population
- 640,000 new homes
- 550,000 new jobs

Its full set of actions is provided in Appendix 1 to the INSDSS.

The NSW State Plan, released in November 2006, provided overarching goals, including: healthy and harmonious communities, a high quality public transport system with cycling and pedestrian networks, improving urban environments, stimulating business investments, providing for open space and the arts and increasing the number of dwellings within thirty minutes travel of a Strategic Centre.

The Urban Transport Statement also released in November 2006, proposed new infrastructure, strengthening of eighteen transport corridors and a new Centre for Transport Planning and Product Development.

The

The majority of town centres

Within the Inner North, the expansion of Macquarie Park has impacted the office market of other centres, such as North Sydney and Chatswood, which have to compete with the availability at Macquarie Park of larger sites and higher levels of parking.

This availability of parking, lack of public transport and sprawling nature of the campus style built form has resulted in a high level of private car use by workers and resulted in severe traffic generation issues.

Despite these issues, the Inner North Subregional Strategy outlines a substantial expansion in the capacity for employment generating activities. The strategy states that Macquarie Park has the capacity to provide a further 1,700,000 m² of commercial/office floor space and has an employment target of 23,100 additional workers by 2031. This equates to a potential total of 55,300 workers in Macquarie Park by 2031.

The Department believe the arrival of new rail infrastructure and introduction of a metropolitan wide parking policy will encourage greater use of public transport to this centre. However, unless there is a move away from low density campus style development and a significant intensification around the planned stations, the expansion of Macquarie Park will only increase the dependence of workers on the private car and compound the existing traffic congestion issues.

Corridors

Population targets

The majority of the NSROC councils are planning to meet the targets identified within the INSDSS. There does remain significant concern that the target of 30,000 additional dwellings by 2031 assigned to the Inner North Subregion is excessive. A dwelling increase of such scale will generate unsustainable levels of through and local traffic on the Warringah Expressway, Pacific Highway and North Sydney's local road networks, and have unacceptable impacts on the communities in the northern region of Sydney.

These impacts range from air quality degradation, noise, severance and intimidation of pedestrians, to increased accidents, traffic congestion, traffic volumes and parking pressures. Additional impacts include increased pressure on social infrastructure (libraries, hospitals, schools, universities, recreational space) and utilities (no mapping of drainage, water, electricity, communications or gas has been provided).

There are as yet no guidelines or criteria to ensure consistency in the approach which councils take to locating residential or other growth, while retaining local character - it is left to councils to devise these criteria for themselves. It is recommended that these be prepared to assist "ground-truthing" of whether the Strategy's targets are realistic, allowing for local topography, environmental and built character etc, so as to provide strategies of substance rather than the INSDSS remaining a set of visions only.

These criteria should ensure protection of "non-negotiable" areas of environmental and other significance and adequate non-developable land for community facilities, recreational and other essential needs of the increased population demand. The Strategy's draft mapping of such areas does not give confidence to Council, in the face of the requirement under the Standard LEP template to replace the former bushland zone with a single Public Recreation zone, implying that active recreational uses may be encouraged to encroach upon passive bushland areas.

Uncertainty regarding employment targets

Employment targets for the NSROC councils have been identified in the INSDSS. While in some cases these figures are in accord with work done by the individual councils, for others the figures remain notional without robust studies to identify industry trends, infrastructure capacity, market demand, uptake constraints and inter and intra-regional competition. While the work which has been completed by SGS provides some regional analysis it does not provide councils with any ability to verify or endorse the employment capacity figures. There is also further work to be done

in identifying mechanisms councils can use to assist employment take-up when zoning capacity remains unused. Like the housing targets, more time is needed to 'ground truth' the figures and it is suggested that additional funding from the Planning Reform Fund be given to the NSROC councils to conduct Employment Studies to this end.

Concerns relating to infrastructure commitments

Council calls upon the State Government to take responsibility for committing to planning adequate infrastructure to service the growth which councils are required to provide over the 25 years to 2031. The INSDSS lists numerous State planning studies and actions without any proposed timeframe being given.

The Premier's Department, Treasury and other State departments need to be formally involved in implementing the Department's Metropolitan Strategy and its subregional plans before councils can finalise their own detailed planning in response.

NSROC has already identified key regional infrastructure requirements it sees as necessary to enable further residential consolidation of the scale envisaged in the Metropolitan Strategy. These are:

- a) Completion of the Parramatta – Chatswood Rail Link;
- b) Completion of the M2 – F3 Orbital Link;
- c) Hornsby to Newcastle High Speed Rail Link;
- d) Bus-only Transit way between Chatswood and the Brookvale / Dee Why Centre;
- e) Integrated public transport to Macquarie Park;
- f) A second Harbour Bridge Rail Crossing;
- g) A pilot Project to introduce Demand Responsive Transport public transport services that complement and meet service gap areas under the new Principal Bus Contractors arrangements;
- h) Creation of transport strategy for the Victoria Road corridor, to address private vehicle and public transport;
- i) Improvements to major intersections on state arterial roads (e.g. flyover at the intersection of Boundary Street & Pacific Highway and a flyover at the Archibald & Penshurst Street);
- j) Retention of existing ferry services in the region and exploration of possible extension of the ferry services;
- k) Creation of a Pacific Highway Corridor Strategy to relieve growing pressure on this major North-South artery; and
- l) A strong focus on, and commitment to, active transport (bicycle and pedestrian) programs and infrastructure.

NSROC notes that the only infrastructure that will be identified in the sub-regional plans is the infrastructure already identified within the State Infrastructure Strategy (SIS) released in May 2006. While NSROC is strongly supportive of the SIS process it remains concerned that this does not provide the finer grain of infrastructure projects that are required at a more local region to ensure sustainable growth. NSROC also notes that the SIS does not identify social infrastructure (libraries, cultural facilities, sporting facilities which are required to provide for sustainable population growth. Furthermore the SIS does not detail all utilities requirements (specifically stormwater and sewerage management) which would enable further densification and not all the projects are fully costed (the only funding identified for the new North West rail line is for land purchases).

NSROC notes that there is only 70% concordance between the current SIS and the Metropolitan Strategy and that it is the expectation of the state government that this will improve over time, however NSROC has consistently maintained that it can only manage significant urban consolidation with the provision of sufficient new infrastructure and the on-going funding and

maintenance of existing infrastructure. NSROC is not as yet convinced that the SIS with its limited forward budget time frame of four years provides adequate surety in this process.

NSROC supports the notion of connecting centres with the Transport Network but notes that this is an existing initiative that commenced independent of the Metropolitan Strategy process. NSROC would look to the Metropolitan Strategy to identify commitments for public transport infrastructure over the next 30 years.

While the Northern Region has substantial infrastructure for road, rail and some other transport services, that infrastructure will not be able to serve the Region's increased demands due to urban consolidation, sustained competitive economic growth and cross regional transport (particular Western and Central Coast through traffic) without a long term plan for maintenance and upgrades to keep pace with demand. New transport infrastructure proposals should proceed on the basis of a close, consultative partnership with ROC'S within whose LGA a project is proposed.

Lack of Detail in Strategy

- *The Strategy lacks details and has failed to establish clear steps for implementation.*

The Strategy includes many commitments to assist Council to implement various proposed actions, however a timeframe is not included as to when this will occur and how those actions will be progressed. While the key directions' concepts are generally supported, the Strategy has failed to provide greater details to explain how the plan can be achieved. The overall plan is not well coordinated.

Environmental Sustainability

NSROC remains concerned that the issue of environmental sustainability has not been adequately addressed within the INSDSS. The NSROC Regional Environmental Report titled "The potential Environmental Impacts of a Substantial Population Growth in the Northern Region of Sydney" (Noonan 2005) concluded that 'Intensification of the population of the NSROC region will unavoidably impact on the key environmental assets that are highly valued by its residents. Some changes will be manageable, but others will be irreversible" (page 5).

These impacts are already manifesting themselves through degraded water quality, the high number of threatened species within the region, and the increasing prevalence of noise, air and pollution related issues as identified in the NSROC regional State of Environmental Reports released in 2004/05 and 2005/06. Whilst Council planning and activities can affect the environmental impact of development within its sphere of influence, the State (and Federal) government must make the big commitment to energy and water policies that will protect our environment and natural resources, reduce greenhouse gas emissions and enable adaptation to the future climate conditions.

The key direction of 'manage all development sustainably' is unlikely to be realised. Some development is not sustainable. The draft Strategy should state the direction is to 'maximise sustainability outcomes for the subregion'.

The Strategy should include a definition of sustainability and its three parts and have a strong focus on reducing greenhouse gases. Joining "sustainable" together with "growth" or "development" does not in fact make it so. What is needed is a truly sustainable vision.

Under environment management challenges (p. 86) the Draft Strategy fails to list climate change, rising sea levels or reducing greenhouse gas production as challenges we should answer.

P. 88 speaks of reducing the urban footprint and 'moving towards cleaner energy' – without clarifying what this is meant to be. (Clean coal or renewable energy?) There is no mention of climate change mitigation by reducing greenhouse gas production. Instead it speaks only of 'responding to the risks', or adapting to climate change. It would be much better to actually stave off massive climate change.

P. 92 promotes water sensitive urban design, which is supported and being implemented by Council.

The action on p. 94 “contain Sydney’s urban footprint”, provides no information about how this should be done. In the absence of a clear strategy and action plan, the statement is meaningless.

The draft Strategy should champion sustainable building and give examples in the sub-region.

The Summary of Objectives and actions “Protect Natural Environment” E2 (from p. 90) are reasonable, but the actual process of achieving them is uncertain and in many situations progress is unlikely unless increased funding is supported. For example, there could be specific Environmental Levy programs which the State government encourages and promotes. This could be on an LGA basis as with Willoughby City Council’s e.restore program or a levy program across the entire sub-region for major environmental improvements.

Housing Affordability

The Draft Strategy states that the State Government will develop initiatives to provide for affordable housing through its Affordable Housing Framework. The State government has been promising State policies on affordable housing for the last decade, but to date no substantive or effective program has been developed. The necessity for the involvement of all three levels of government to work together on this complex issue to achieve more affordable housing outcomes should also be acknowledged in the Strategy.

The growth in housing supply and increasing property prices has not assisted housing affordability in the Northern Region. This has impacted on the ability of many industries, businesses and service delivery to attract workers who by necessity must commute from outside the region, including the Central Coast.

Active Open Space and Sportsfields

The management of open spaces and conservation areas; a commitment to energy and water policies that protect our environment and natural resources; the cultivation and promotion of cultural activities similarly will require significant support and funding commitment from the community and from governmental agencies.

Additionally, the embellishment of public spaces and implementation of new public domain areas; their landscaping; the improvement of pedestrian systems; the construction of new cycleways; bus shelters; the undergrounding of power lines and removal of power poles; improved and safer road crossings; are all outcomes that can only be achieved with additional funding.

The Draft Strategy emphasises that Council should make better use of the existing public open space areas, either by embellishment, more linkages and access. There is a clear assumption that the proposed additional population (both working and residential) will be adequately serviced by these improvements, rather than additional open space areas being required – i.e. a quality rather than quantity philosophy.

Given that more than half of the sub-region’s open space is protected bushland, and the price of the sub-region’s real estate renders significant acquisition beyond any council’s financial ability, the Draft Strategy takes a simplistic attitude to addressing the increased population that it proposes. Suggestions in the Draft Strategy are better suited to councils where green field sites are still being planned, or where land purchase is economically viable.

An example of this simplistic approach is the suggestion that ‘Councils should consider the mechanisms to increase the capacity of local sports-fields to a district level’ (F.2.1.3 page 105). It is well reported that residential areas oppose the upgrading of local sports fields to district level (with floodlights, car parks etc), regardless of the high demand and need for active sports areas for children and increased sport participation by the community. Consequently an increase in

population will hardly be supportive of any Council attempting this type of 'quality' intensification to existing public open space.

Another very topical example of current demand is the rising level of dog ownership, the demand on unleashed exercise areas in parks and the ensuing conflict with other (non-dog) park users. The draft strategy ignores this very real problem.

The Draft Strategy should list in its References the NSW Dept Infrastructure Planning and Natural Resources 'Assessing Sydney's Recreation Demand and Opportunities', August 2004. The latter document was well researched and forms the basis of the Government's Greenspace Program directions. It also guides local councils in setting their community recreation priorities.

Governance

Create a sub-regional governance structure which includes state agencies and local government with specific responsibilities to deliver outcomes through the plan

Exploring Decentralisation

A State-wide Strategy is required to respond to the growth constraints discussed above. This should examine strategies for encouraging businesses to decentralise, to support population growth in a balanced series of centres throughout NSW. The requirement to locate 70% of Sydney's growth in the inner suburbs must principally be achieved with residential flats, so that the demography of the Inner North in particular will be increasingly skewed against family formation.

Lane Cove's housing already comprises almost 50% medium-high density dwellings. The growth target of 3,900 will change this to over 62%, altering the balance of community facilities required for the older demographic typical in units.

The targets have been based on growth patterns over recent decades. There is inadequate data however on Sydney's land capacity limitations to absorb growth and the necessary infrastructure.

The question of whether it is appropriate to impose major growth on Sydney, or instead to decentralise growth, should be examined before, not after, councils in the inner subregions are finally committed to increasing dwellings, jobs and infrastructure through their LEPs.

Growth Scenario may not occur

Implementation Plan

Needs an implementation plan with time frames, responsibilities and key indicators for success. The Draft Strategy concludes that dwelling and employment capacity targets contained in the Sub Regional Strategy will be reviewed on a five year basis with available census data and the Strategy reviewed and adapted accordingly. This emphasises the key intent of the Draft Strategy – dwelling and employment targets.

The final Strategy should incorporate equal State Government accountability for outcomes in terms of infrastructure, transport, and open space provision, greenhouse gas reduction, environmental degradation and pollution. Essential for this is the development of criteria or tests for determining between economic/growth outcomes as against social or environmental outcomes.

The Metropolitan Strategy provides sound generic planning policies for housing growth in the Sydney Region, such as density increases along transport spines, urban renewal focused on growth corridors, housing linked to community development and others. Northern Region councils are already undertaking many of these measures. The Strategy's successful implementation will

depend, however, on it developing more comprehensive and detailed actions, clarifying (i) the criteria for specifying how housing growth is to be balanced between individual council areas, (ii) a consistent Sydney-wide process for integrating data collection and monitoring growth against sustainable performance measures and (iii) likely infrastructure changes or upgrades to meet housing growth.