



NSROC Submission

Sydney over the next 20 years - Discussion Paper Response

Prepared by NSROC -Northern Sydney Regional Organisation of Councils

Representing:

- Hornsby Shire Council
- Hunter's Hill Council
- Ku-ring-gai Council
- Lane Cove Council
- North Sydney Council
- City of Ryde Council
- Willoughby City Council

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REFERENCES

- Submission to NSW Long Term Transport Master Plan, NSROC, April 2012
- Missing Link and Missing Out – Prioritising the F3-M2 Connector, NSROC, April 2012
- Regional Priorities-Key actions for Northern Sydney’s future, NSROC, March 2012
- Submission to the NSW Planning Review, NSROC, November 2011
- Submission to the Metropolitan Strategy Plan Review, NSROC, May 2010

OVERVIEW

Councils : Integral participants in the Sydney Metropolitan Strategy

This NSROC submission focuses on the key issues for metropolitan planning in the NSROC Council area and the surrounding northern Sydney region.

Our Councils are critical players in effective metropolitan planning and management and as such, the knowledge and commitment embedded in local government is a major asset for master planning in Sydney.

Firstly, councils play a key role in the strategic land use planning and transport planning which is the foundation for the Metropolitan Strategy. As landuse planners, Councils designate employment, residential, service and commercial land interdependently and take account of transport needs and future transport options that link the city together.

Second, while other levels of government play a part, a key function for councils is the coordination and development of urban centres. Councils are the “place makers” for their communities. We are seen as responsible for developing the right mix of facilities and services to create vibrant places for our communities to gather.

Finally, councils alone should not be held accountable for metropolitan planning failures. A State Government, which articulates a vision and strategy, must be held accountable by meaningful performance targets and reviews. A new Strategy should recognise that obligations it places on one level of government must be reciprocated by obligations on the other. Should critical infrastructure provision by State agencies fail, then concessions on the obligations imposed upon local government should be provided.

This submission is not strictly structured to the question format of the discussion paper but addresses the themes and issues raised. This submission should be read in conjunction with the submissions of our individual member councils of Hornsby, Hunter’s Hill, Ku-ring-gai, Lane Cove, North Sydney, Ryde and Willoughby.

BACKGROUND

WHAT IS NSROC?

NSROC is comprised of seven councils (Hornsby, Hunter's Hill, Ku-ring-gai, Lane Cove, North Sydney, Ryde and Willoughby) 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. Some key information about the region includes:

Development¹

- Development across region is \$1.8 billion (excluding State and Federal government projects) or approximately 9% of the value of development approved across the State.
- NSROC processes around 6% of the DAs in NSW
- DA processing times (gross and net) are shorter than the state average

Community

- Population at 560,000 (estimated to be 680,000 by 2036)
- Aged populations are increasing while youth populations are decreasing.
- Highest growing ethnic community is Chinese

Economy²

- Gross Regional Product in 2011 - \$43 billion, or about 11% of NSW Gross State Product.
- There are 67,700 registered businesses and 3.6% unemployment compared to 5.2% NSW average.

Transport

- The region is a key corridor for transport for people and products throughout Sydney and the region is a key through route for intra and interstate freight transport.
- Over 250,000 people work in the region. Around 30 per cent of the region's workers travel by public transport while around 70% travel by car. Half of those employed in the region travel daily from adjacent areas including the North West, the Central Coast and Parramatta.
- Car ownership is rising twice as fast as the population growth rate. Over 80 per cent of the region's households own a car and almost a third of households have two.
- The region has some of the most congested roads in Sydney including : the Pacific Highway, Pennant Hills Road, Military Road and Victoria Road.

¹ Local Development Performance Monitoring 2010-2011, NSW Department of Planning

² NSROC Economic Profile www.nsroc.com.au

RESPONSES TO DISCUSSION PAPER

1 Housing

Greenfield and infill development

All cities must wrestle to achieve the right balance between greenfield and infill development. However prescriptive percentages, such as the previous Government's mix of 30 per cent greenfield and 70 per cent infill housing, are crude tools that do not recognise a number of considerations which are critical to good housing outcomes. The housing mix, the balance with other land uses, the available public infrastructure and transport access must all be considered for housing outcomes to be optimised in any location.

NSROC councils argue that greenfield development must be simultaneously accompanied by complementary public infrastructure. The development of the North West Growth centre was predicated on the complementary provision of a North West rail service but was not 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 the NSROC area.

The North West Growth centre scenario cannot be repeated. It is essential that public transport be planned and operational in greenfield developments as they are established. This can and does occur in many other regions in Australia to great benefit. For example, in Mandurah south of Perth, rail and road connections were developed (along a common route) so that new residents were able to establish commuting habits as they settled in the region. The added benefit of this development was the concurrent layout of energy and other cabling for the development along the common transport corridor.

The value of concurrent housing and public transport provision in new sites is that it immediately ameliorates the need for additional vehicles and embeds commuting behaviour and public transport usage for the community. Cluster density and complementary access (bike paths, park and ride facilities) around greenfield public transport will also maximise usage and utility of services.

In infill areas, a critical concern is cumulative impacts of development and failures to upgrade infrastructure to meet new demand. In the NSROC region, particularly the councils with medium and high density housing, new development places increased pressure upon limited open space and this can reduce the public and community amenity. Thresholds of development need to be determined so that clustering of infill development does not generate perverse outcomes.

NSROC also 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 then local and sub regional employment and economic capacity will be reduced. This inturn exacerbates transport demand and travel to work issues, which from a sustainability perspective, must be minimised.

Housing Targets for LGAs

NSROC councils recognised the previous housing and employment targets of the 2005 Metro Strategy and responded to these targets in their planning instruments. However from time of the targets announcement, NSROC has repeatedly sought information about the methodology by which they were created with the Department of Planning. A satisfactory explanation has never resulted.

NSROC argues that if targets are to continue to be applied to LGAs, a transparent methodology must be created that takes into account capacity of supporting infrastructure, equity and also cumulative impacts of historic population growth.

A further issue is the ongoing extrapolation of targets into the future. NSROC councils would argue that targets should be adjusted to acknowledge allocated growth in planning instruments and actual growth in intervening periods. Notionally, in certain high density areas, further targets may not be appropriate where saturation of density has occurred.

Affordability

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 increases the demands on utilities, infrastructure and local community services and transport. 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. Council have now begun to address these issues with the application of Section 94A contributions for some of these developments. However there is no standard approach across councils and consideration should be given as to whether a common approach should be taken to this issue.

Councils are concerned about 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.

Housing Flexibility

Given the population and urban renewal targets already in place 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, 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.

2 Jobs and Economic Opportunities

A key element in attracting jobs and business to a region is the certainty of appropriate and timely infrastructure development. A Metropolitan Strategy 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.

Historic metropolitan plans identified key retail and transport centres across Northern Sydney for growth and renewal as part of its planning for increasing population density and new jobs. Generally, these are existing centres. NSROC councils have found that focussing on existing centres maximises benefits and minimises costs, while creating new centres in existing areas generates significant cost and community opposition.

Strategic Centres

NSROC has repeatedly argued that the Metropolitan Plan should recognise that northern Sydney is a regional area. As such Chatswood CBD should be redesignated from a Major Centre to a Regional City. Consistent with the west, south and central delineations of Penrith, Liverpool and Parramatta CBDs, Chatswood CBD serves as the regional centre for northern Sydney. It is the focus for a range of community civic and cultural activities and its population, employment, economic activity and public transport hub make it the primary loci for the region. This reclassification is particularly pertinent given the Transport for NSW announcement in June 2012 to utilise Chatswood as the primary transfer point for commuters on the North West Rail Link.

NSROC supports the continuing classification of the North Sydney Centre as part of "Global Sydney" in conjunction with the Sydney CBD. To assist this arrangement, continued improvements to the connections between north Sydney and the Sydney CBD are needed, in particular better pedestrian and cycling access in the approaches to the Sydney Harbour Bridge.

Specialist Centres

Northern Sydney has two identified specialised centres. Macquarie Park is a nationally significant research and business centre, specialising in the communications, medical research, pharmaceutical and IT&T sectors, and is often described as 'Australia's Silicon Valley'. St Leonards is a health, allied health and corporate precinct.

NSROC councils advocate that the Metropolitan Strategy should contain a more sophisticated approach to the “city of cities” and actively encourage the specialisation of centres as part of an economic growth strategy for Sydney and NSW. This would also send an important signal to the market regarding confidence around business clustering and targeting investment in key sectors. As such NSROC has identified further expansion of both centres and marked their development as a key regional priority.

NSROC has also identified challenges in delivering a richer and more dynamic economic and social mix in existing centres, with many of the area’s centres lacking vibrancy, particularly after normal business hours.

For example Macquarie Park is currently looking at modifications to improve connectivity for pedestrians and generate a ‘nighttime economy’ and ‘cultural hub’ which enlivens this precinct after hours and on weekends.

Also councils are examining ways to manage main street precincts. With changing consumer behaviour (including the shift towards online shopping), the retail mix in shopping areas is changing. NSROC councils have observed that successful main streets areas are uplifting their public domain elements and entertainment/social capacity to become a place for community gathering and recreation as well as for retail services.

The reality is that all centres need constant refinement to maintain and enhance vibrancy, and to benefit local economic growth, jobs and public safety.

Ownership issues

Metropolitan councils face significant challenges in enhancing business or retail centres that have disparate ownership structures (such as main streets). This typically requires far more coordination than large shopping complex centres which have a centre management system. Tools which allowed councils to apply a centre management system for renewal and upgrade to smaller centres should be explored. Some of these include additional planning tools and rating options, such as business levies. These have been applied at various centres internationally, often as Business Improvement Districts, as a means of funding the reinvigoration of existing centres, whilst also devolving a degree of autonomy and control over centres directly to the local businesses that operate there.

Key workers

An acute problem emerging in relation to the reinvigoration of key centres is housing affordability for key workers. Anecdotally, businesses in the region are finding it increasingly hard to employ key workers in vital services such as childcare, health, urban services, and hospitality. This is linked to housing affordability issues noted previously.

Rents and land values in the region are continuing to rise, and residential vacancy rates have been low for some time. A high proportion of households spend 30% or more of their income on rent or mortgages and the region faces a significant shortage of lower cost housing available for rent and purchase. The region’s economic performance requires a mix of workers including low income workers.

These include cleaners, hospitality, transport, and maintenance workers who enable the region's businesses to function smoothly every day. They do not qualify for public housing but increasingly are not earning sufficient income to afford rents close to their work. Often they are facing long and costly travel to work. Over time, these people are being squeezed out of the region.

A related issue is the shortage of lower cost accommodation for students in proximity to places of education, most significantly Macquarie University. Students can represent a significant employment pool of key workers, as well as adding vibrancy to an area, however, the experience in northern Sydney is that many students are unable to live in proximity to the university and other tertiary education facilities.

3 Transport

The NSROC region's community faces the challenge of inadequate transport every day. Our Councils have been advocating for many years for long term solutions that connect the city, and bring real benefits to its residents, to its economy, and to its environment. The NSROC region has almost half of the most congested traffic thoroughfares in Sydney. While our residents and adjacent areas are expanding patronage of alternative public transport options, they are also enduring longer travel times and an increase in car usage.

Transport corridors and services

Our councils manage and maintain public roads and related transport infrastructure. NSROC councils manage roads valued at over \$2 billion and spend over \$30 million each year on road maintenance. On a daily basis Councils are responsible for local traffic management and have an 'on the ground' knowledge of local transport problems and needs from their residents.

Councils also directly contribute to transport planning by supporting local transport infrastructure and interchange management, developing alternative transport options such as bike and pedestrian routes, and directly providing and subsidising local community transport. Our Councils directly provide over \$1 million of community transport services to the region.

NSROC sees the arterial and major road network as a key tool for business, freight and public transport (bus). The value of improved public transport is the diversion of commuters from individual cars leaving major roads for business and freight users and those not able to utilise the public transport system.

NSROC has made an extensive examination of the region's transport issues which is detailed in its submission to the current NSW Long Term Transport Master Plan process (April 2012). NSROC has also identified transport infrastructure projects and transport services as the top two priorities for the region in the NSROC Regional Priorities Report (March 2012). These documents are attached for consideration in this response.

Collaboration

The Metropolitan Strategy must recognise that local government is a critical decision maker in the transport area and has a significant contribution to make to the creation of an effective transport system.

It is important that communities get the most from their transport infrastructure and that expenditure on long term facilities is made wisely. Councils and communities are expert in the dynamics of their local areas. Local government's land planning and local traffic expertise must be used to inform transport infrastructure provision, to ensure the widest possible public benefit from government investment, and to achieve sustainable urban design outcomes.

Traffic flows must be very carefully managed in northern Sydney. Whilst there is a clear need to focus on corridors to provide connectivity to employment centres, great care must be taken to ensure that local amenity is maintained. In particular, the extensions of clearways, bus lanes and other mechanisms to maximise traffic flows must not be permitted to sterilise local centres and shopping streets. This is a problem across Sydney, but highlighted in northern Sydney in areas such as Military Road and the Pacific Highway. Government must bring a holistic approach: traffic engineering solutions are not solutions at all if they give rise to significant economic, social and urban design problems for the local community.

A truly collaborative approach is required, where local government's roles and activities in relation to transport management, urban design and community engagement are integrated into transport planning at the first instance rather than as a subsequent "tack on" process. With this strategic approach, project outcomes can be significantly improved for local communities, and local government can be proactive project advocates instead of, as has been too often the case in the past, reactive detractors.

Active transport

A key area for local government is providing for active transport – walking and cycling. As well as its obvious health and environmental benefits, active transport can also play an important part in metropolitan transport provision. Sydney's rates for cycling and walking are low compared to other Australian capitals and to similar international sites. Despite comparatively lower costs for providing infrastructure for active transport, often within existing road space, and demonstrably high benefit to cost ratios, cultural biases within State transport agencies that treat cycling and walking as purely recreational have seen an unwillingness by the NSW Government to seriously commit to the support of active transport.

Interchanges

More emphasis must be given to transport interchange planning. Interchange planning must capture both local needs and wider integrated network requirements. There is no single answer to 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 business needs, improving local productivity, topography, commuter parking and connectivity to adjacent services.

Transport for NSW is being set up to contain a unit specifically dedicated to transport interchange management. NSROC supports this unit having consistently argued that special attention is required for sites adjacent to transport infrastructure. It remains of concern, however, that the NSW Government's new governance model for transport does not currently link to or have relationships with local government and their communities. NSROC councils have found that transport agencies have traditionally failed to work cooperatively with local government on major infrastructure. This is highlighted by the poor design and operational failings of the Chatswood Interchange project. The new interchange is unable to cater for current and future bus passenger demand and has poor retail and through connections despite these concerns being raised by Willoughby Council in planning stages with the relevant state agencies. It is indicative of the inability of government infrastructure providers to understand local and regional issues and co-operatively plan for transport services to function within a diverse urban environment but most disappointingly, their reluctance to incorporate local advice and expertise.

Because of these issues NSROC councils seek reconsideration of the former State Government's policy to delineate arbitrary distances from centres or transport nodes and mandate density within the proscribed area. 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.

Freight and business efficiencies

NSROC recognizes that there are a variety of investments required to improve freight efficiency across NSW. While it is recognized that rail freight can be enhanced, the reality is that "end point" freight distribution is by road within cities and suburbs.

NSROC argues that the key freight infrastructure missing in Sydney is the construction of the F3-M2 Link, which when built, will complete the National Road Network.

This issue is of such concern to our region that we have developed a separate paper and commissioned research to articulate the benefits of this project in the NSROC report *"Missing Link and Missing Out - Prioritising Sydney's F3-M2 Motorway Connector"*, attached separately.

In short, the F3-M2 Connector is the only section of the National Road Network through Sydney that is not of motorway standard. All levels of Government have recognised the need to provide this infrastructure from national, state and local perspectives to ensure basic freight, business and individual transport functionality.

Today, without the link, all vehicles travelling north-south along this major freight and general traffic route are interrupted by over 20 sets of traffic lights to the M2 interchange or are forced to travel north-south along the congested Pacific Highway to the Warringah Freeway.

A Price Waterhouse Coopers research report provides background on historic studies and outlines the mounting costs and multiple negative impacts of continued deferral of this project. The report underpins the call for this vital project to be re-analysed, costed and prioritised.

4 Infrastructure

Developer contributions

Developer contributions remain the principle source of infrastructure development funds for councils. However because of the peaks and troughs in the development industry, contributions are not a very stable source of income for councils. As a result Councils aggregate funds until they are at a sufficient scale to fund entire projects, often many years later. Councils must also strike a balance between setting a price that reflects the cost of providing infrastructure and one that is not so high as to pose a barrier to development occurring at all.

The NSW Government cap on developer contributions does not recognise the vast difference in land costs, infrastructure costs and developer returns in different areas, or the different challenges for infill development compared to greenfield sites.

A further problem with the current system is that development contributions must be spent on new infrastructure but may not be spent augmenting existing infrastructure or maintenance. This presents difficulties for metropolitan councils who are undertaking urban renewal or infill development as improvements to existing infrastructure tend to be required rather than the development of new infrastructure. It is also at odds with the infill focus of previous metropolitan plans as well as to efficiencies that can be achieved by augmenting existing infrastructure as opposed to creating new infrastructure.

Regionalising community infrastructure

With employment and population growth targets for established council areas, complementary public, social, cultural and community spaces need to keep pace.

New private development is able to meet population and employment targets utilising existing systems (essentially by constructing new dwellings and commercial space, which represent the highest and best land use). Other infrastructure both private and public, that is essential to the community like aged care facilities, tourism and hotel infrastructure, and recreational facilities, generate lower returns and are being squeezed out of the region. The high land acquisition cost comes on top of a market with little turnover and limited sites suitable for modest scale consolidation to match demand.

As a result, significant local government energy and resourcing is directed into upgrading existing community infrastructure. Regionalising some community infrastructure is one mechanism that NSROC councils are pursuing to maximise the value and utility of community infrastructure. For example the Willoughby City Council has fully funded and developed "The Concourse" Library, Theatre and Cultural Centre in the heart of Chatswood CBD recognising its role in sustaining and broadening the base of the commercial centre into a "civic and recreational destination". It also reflects the regional strategic approach by NSROC Councils by establishing a regional scale cultural hub.

5 Social Inclusion

Vibrant centres

Northern Sydney councils believe that community vibrancy can be improved through cooperative local and state government master-planning. Because development is often the trigger for renewal, there is a need for the planning of centres to be opportunistic rather than prescriptive. For this reason, existing planning tools to allocate land for community uses can be problematic in the case of locating new infrastructure in existing centres and amending planning instruments to achieve these improved outcomes.

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.

Maintaining open space

An emerging issue for the region is the pressures on open space. Open space is not only for recreation and conservation of environmental and cultural values, it is the foundation of urban liveability. It underpins many social, ecological and economic benefits that are essential to the healthy functioning of urban communities. Open space can directly impact on State and Australian Government expenditures over time due to beneficial impacts on rates of obesity and health conditions related to inactivity and isolation.

The northern Sydney region currently enjoys good access to open space. Currently, just over 3,600ha of open space are managed by Northern Sydney councils. This equates to 63m² per capita. Without the addition of new open space, this will decline by 2031 to 51m² per capita due to the addition of an extra 130,000 people to the region.

Though the region's total quantity of open space compares favourably with some other cities, this does not tell the whole picture. Accessibility to open space is generally a better measurement of excellence than total area. Two factors that most strongly affect access to open space are its distribution and accessibility. Whilst there is a good supply of bushland recreational areas in northern Sydney, these are often steep and can be comparatively inaccessible, especially for an ageing population. Furthermore some of our most iconic regional open space that is adjacent our harbour and waterways is fragile due to weather impacts and potential sea level rise.

The southern half of the region with high density residential areas and apartment based living also has a significant lack of private open space such as traditional suburban backyards. As urban densities rise, residents will be increasingly reliant on public open space for activity. But the majority of the region's open space, over two-thirds, is in Hornsby and Ku-ring-gai on the northern fringes of the city, and is the least accessible to the population. There is also a critical lack of active recreation spaces for team sports and other fitness activities, on level sites close to residential centres. State Government policies, such as public access restrictions on school playgrounds after hours, further limits the open space available for community recreation.

Since opportunities to acquire new space are limited, because of the area's high land values, NSROC is responding by intensifying the use of sport grounds and playing fields and planning within existing means for additional facilities to meet future needs. It should be noted that with higher enrolments and more construction on school grounds, school use of council playing fields has increased substantially alongside already increased use by growing populations.

Regulating land use and providing funding through levies or developer contributions, are only partly effective for providing open space. Unlike most acquisition models for development, which rely on the generation of a revenue stream, open space adds only ongoing operational cost.

The adaptation and renewal of surplus public land can offer some opportunities for increasing open space. Recently, however, the planning system in NSW was amended so that future zoning of non-standard lands, such as a school or parks, are default zoned to adjacent uses. State and Federal agencies have typically sought to dispose of surplus land with a view to maximising financial return to government rather than focussing on the potential for local community benefit. This means properties that may be potentially suitable for community infrastructure such as open space are now likely to be default zoned to high value land and these agencies will be under pressure to achieve that value.

Dedicated funding can also be applied to the provision of new open space, such as the Sydney Region Development Fund. That fund serves the Metropolitan Greenspace Program. Over time local government in the northern Sydney region has contributed millions of dollars towards this fund, yet little additional regional open space has been provided in the area. While NSROC recognises there are needs in other parts of Sydney, it advocates for more balanced provision mechanisms and seeks the review of the Green space program with the aim of refocusing it on delivering new open space assess or facilities not just embellishment.

Planning for ageing communities

Northern Sydney has a significantly aging population compared to the Sydney average. It has a smaller proportion of younger people (aged 0 to 17) but a larger proportion of people in older age groups (60 years and over). The 2011 census is expected to show the Northern Sydney region to continue to have a comparatively large ageing population compared to the rest of Sydney.

Aged and retired residents tend to be higher users of local government services. In the NSROC region there is an increasing demand on councils to modify and retrofit existing community facilities to fit the ageing population's needs. The provision of

modern infrastructure in existing urban areas is very different from its historical delivery. Local government is dealing with considerable financial outlays for land acquisition and high construction costs in order to provide local community infrastructure.

There are three key concepts around ageing provision that impact on metropolitan planning.

“Ageing at home” refers to the government objective to enable aged people to stay at home with appropriate support. The adaptability of individual dwellings to support this aim becomes highly relevant. One impact of the ageing population is ‘empty nesting’, where ageing people tend to stay in larger homes after children have moved out. There are multiple reasons for this, however the high costs of relocating to new homes as well as a lack of supply of smaller dwellings in existing areas are significant factors. Existing systems also act against the option of downsizing family homes, due to the high cost of adapting existing dwellings, and often because of regulatory barriers to conversion of individual dwellings for subletting and subdivision.

Innovative solutions to dwelling adaptability should be examined, such as dual keying, where dwellings are readily convertible for subletting but cannot be separately titled. Anecdotally, these have been successfully applied in some new developments, particularly those close to universities where there is a high demand for student accommodation (typically a three bedroom dwelling might consist of separable two and one bedroom sub-components). Models should examine ways to improve adaptability without leading to the adverse amenity issues created by former dual occupancy policies. Ideally, housing infrastructure in the region should be easily adaptable as community demographics change over time.

In addition to ageing at home, the region has a high concentration of aged people who are anticipated to require external care in aged facilities. “Ageing in place” refers to providing a single admission to a facility which provides a holistic service from low care to high care. Ageing in place facilities have a minimum land requirements based on configurations determined by regulatory requirements and financial viability constraints and can include a mix of aged care units, publically accessible retail, open space and specialist care.

“Ageing in region” relates to transitioning into an aged care facility that is provided within the region. This principle recognises the benefits to and desire of aged persons to remain within their local community or regional area. Ageing in region implies a minimum distribution of aged facilities matched to needs and concentrations of aged persons within an LGA or broader regional area.

While councils are not typically providers of aged facilities, there is general concern within the Northern Sydney region about these ambitions for “ageing in region” and “ageing in place” and the region’s capacity to respond. Shortages of aged places and packages have already been identified across northern Sydney based on current populations and ageing profiles. Based on Commonwealth recommended targets over 800 community aged places must be delivered by 2016 if ageing in region is to be a reality, as well as another 213 residential places in the southern half of the region.

NSROC's concern is that the timely supply of sites suitable for these aged facilities will not necessarily be generated through market forces and may be inhibited by certain land planning arrangements.

The property market is not fluid and developers may not be able to access contiguous or consolidated land parcels for aged care purposes at particular times to match demand. The region also has high land values and suitable land parcels required for aged facilities do not frequently come onto the market. With the shift to "ageing in place" facilities, that include the whole spectrum from low to high care, even larger investments and footprints may be required for private operators to be economically viable. Anecdotally, even after land has been acquired, development can be slow with aged facility development in the northern Sydney region taking on average between 3-5 years from inception to operation.

Consequently the Metropolitan Strategy must examine the allocation and distribution of sites for purposes such as aged care in a more holistic way. Consideration should be given to zoning options and other planning mechanisms to enable this to occur.

6 Environment and Natural Hazards

Land planning for waste management

An emerging issue for environmental management and planning in the metropolitan region is the enabling of regional or localised waste management options for growing communities. Various initiatives, direct and indirect such as the NSW Waste Levy and costs of transportation, are pushing residents and councils to minimise waste and its impacts.

Current NSW policy is seeking to aid these efforts with the NSW Governments State plan indentifying the need for Community Drop-Off Centres to make it easier for people to recycle and also specific Office of the Environment and Heritage policies under development such as the programs for the investigation for AWT and Waste to Energy solutions.

To achieve these objectives, the Metropolitan Strategy needs to include the examination of land use planning instruments to enable effective planning of regional and local waste infrastructure including collection points, transfer stations, alternative waste technologies (AWT), and energy to waste facilities, should this be the most environmentally and economically sound approach.

Environmental regulations

In terms of mitigating energy and water consumption the State government should adopt a goal of enhancing BASIX to all dwellings and introduce a similar scheme to apply to commercial development. Consideration should be given to the creation of renewable energy precincts or hubs that reduce peak demand on energy supply.

Regional and cross regional analysis should be undertaken by the State appropriate authorities. For example air quality and water quality testing in the NSROC region is sometime funded by councils and may not use common methodologies. NSROC

sees both information consolidation for metro planning purposes and financial savings being generated were “whole region” testing to be the explicit responsibility of agencies such as the Sydney Catchment Management Authority and the Office of the Environment and Heritage.

7 Rural and Resource Lands

In previous NSROC submissions on planning, NSROC has raised the lack of effective measures to maintain diversity of land holdings and protect local food production.

Protecting land on the city fringe is a key issue for our region. Member councils Hornsby and Ku-ring-gai are bounded by large tracts of protected bushland and agricultural or semi-rural land. Once a greenfield development fragments a large parcel of rural land it cannot be reformed back into rural land. For this reason rural lands should be protected as a resource for future local agriculture purposes. The Metropolitan Strategy should include actions to preserve existing land for agricultural purposes on the metro fringe.

8 Connecting with the Regions

In previous Metropolitan Plans there have been assumptions of fixed population growth for Sydney. NSROC agrees that connections with regions, particularly the current population movements and employment flows between the Sydney Basin and adjacent regions such as Central Coast, Wollongong and Newcastle must be examined in the Metropolitan Strategy. Planning for Sydney cannot be made in isolation and in absence of transport and economic strategies that could encourage population growth outside the Sydney region.

The Metropolitan Strategy should link with strategies for population diversion, through transport and economic policies, to adjacent regions. As such enhancement and support for decentralisation to Growth Centres outside the Sydney Basin such as existing regional towns needs to be reconfirmed.

9 Delivering the Strategy

A key criticism made in previous NSROC responses to Metropolitan Plans is the lack of end of term reporting and analysis mechanisms embedded in the plan. Without these systems for accountability and performance measurement, plans and strategies are meaningless.

NSROC recommends that the Metropolitan Strategy have some level of statutory support, transparent allocation of tasks for State agencies, and accountability for delivery. This contrasts to historic plans and strategies where the only compulsion for action has been upon local government. The most critical area where this is required is the matching of state provision in transport infrastructure with the local government delivery on housing and employment targets.

Local councils recognised that alone they cannot generate the strategic outcomes set by the community for the whole metropolitan complex. Where State government sets strategic goals for the Sydney, it must take strategic and financial responsibility

for them. To be effective in this strategic role the Strategy must also include guidance as to how agencies are to resolve differences between competing objectives/principles to deliver on their obligations.

Finally the Strategy must identify priorities but build in flexibility in delivery timetables in order to be able to respond to changing circumstances.

Subregional Strategies

The Metropolitan Strategy, once established, requires support through updated Subregional Strategies. The NSROC area is currently covered by 2 strategies the North Sydney Subregional Strategy and the Inner North Subregional Strategies. These Draft Subregional Strategies, which accompanied the 2005 Metropolitan Strategy, are key tools for implementation of the Metropolitan Plan. While the Subregional Strategies require partnership with local government (particularly in the setting of housing and employment targets), they should be developed promptly to enable coordinated implementation of the entire metropolitan vision.