

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

6 February 2008

Dear Mr Haddad

**Re: Sydney Metropolitan Strategy Sub-Regional Planning Process**

The Northern Sydney Regional Organisation of Councils (NSROC) is comprised of seven councils (Hunters 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 sought to work 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 North Subregion Draft Subregional Strategy

**January 2008**

This submission has been prepared by NSROC in response to the draft Subregional Strategy titled "North Subregion Draft Subregional Strategy" dated November 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 Board.



## 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, bushland 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 Planning'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 the NSROC councils were informed that the sub-regional plans would 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 [www.nsroc.org](http://www.nsroc.org).

All of the above documents have been provided to the Metropolitan Strategy team and it remains NSROC's expectation that they will assist in the completion of the two sub-regional strategies which are being finalised for the NSROC region. This research also provides a robust platform for consideration of some of the issues of concern contained within the North Sub Regional Strategy which are discussed in greater detail in the following pages.

## General Comments

NSROC welcomes the development of the North Subregion Draft Subregional Strategy (NSDSS) 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 (including Ku-ring-gai and Hornsby) also have available, or are willing to jointly undertake, appropriate research to determine the timing and location of growth as well as development capacity.

NSROC also commends the state government in recognising that planning for the future of Sydney requires a subregional approach in recognition of the heterogenous nature of the city and its people. While the NSROC area is an established one, NSROC 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. NSROC agrees this growth would best be accommodated within the developed footprint of the existing urban areas. Future development should not result in a 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).

NSROC is concerned that the issue of infrastructure has not been adequately addressed. While the NSROC area has a variety of transport services and other infrastructure, the anticipated population and employment growth within the North Subregion requires 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. Recent moves by the state government to restrict the abilities of councils to raise and commit funding for regional infrastructure (changes to Section 94 legislation) further compound the infrastructure problem.

Significant concern remains regarding the scale and timing of infrastructure delivery as identified within the NSDSS and the on-going reluctance of the state government to commit to infrastructure delivery beyond the ten year time frame of the State Infrastructure Strategy. NSROC is particularly concerned regarding recent statements made in regard to one of the key infrastructure deliverables of the entire Metropolitan Strategy, the proposed North-West railway line. The suggestion that this vital piece of infrastructure might not be built undermines the credibility of the Strategy and raises the spectre of councils committing to housing targets on the promise of infrastructure delivery which does not ultimately eventuate.

The NSDSS makes 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 Ku-ring-gai and Hornsby Shire Councils are in the best position to undertake the detailed local planning required to cater for current and future population growth, however it should also be noted that the ongoing threat of the Minister using his powers under Part 3A for rezoning/redevelopment of particular sites may undermine the objectives of the draft Strategy.

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 Metropolitan Strategy needs to clearly state that achievement of a concentrated, rather than a dispersed, pattern of future development is highly desirable for Sydney. NSROC also supports the majority of the identified urban hierarchies although there are some exceptions which will be identified in Ku-ring-gai's and Hornsby's individual submissions.

NSROC supports the notion of employment targets however the NSDSS does not provide a robust case to support the targets provided. NSROC is aware that some studies have been completed but the data has not been provided within a subregional context other than a snapshot of current ABS data. The draft NSDSS states that the employment capacity target for the North was formulated using a city-wide forecasting tool and that the target will undergo further refinement when the full 2006 census and journey to work data is available. The Department should note that a joint employment study is currently underway between Hornsby Council and Ku-ring-gai Council

in partnership with the DoP. This will provide a more accurate picture of employment trends within the region.

At present the North Subregion is plays a significant role in providing skilled workers and a knowledge based economy as part of the Global Arc extending from Macquarie Park down to North Sydney. The significance it has in the state economy is identified in the Economic Report completed by the Centre of International Economics in late 2005. In the absence of robust fine-grain analysis and mechanisms beyond land-zoning to manage employment growth, the targets within the NSDSS remain notional.

While all of the key directions in the NSDSS are supported, NSROC would like to see greater detail provided under each key direction. Specifically NSROC notes the absence of delineated responsibilities, performance indicators, budgets and timetables for the actions identified under each direction. Many actions hinge on the production of an additional plan, framework study or set of criteria but do not provide tangible outcomes in themselves. NSROC supports the development of a clear and committed implementation plan to complement the NSDSS.

The North Subregion has a rich environmental heritage and the natural environment and access to environmental assets is one of the chief attractions of the region. NSROC agrees with the prominence given to environment in the NSDSS but notes none of the actions significantly extends the state government's commitment to environmental sustainability within the specific context of North Subregion. NSROC has commissioned a significant environmental report on the impact anticipated population growth will have on the region and, in addition, measures current environmental pressures through a regional State of Environment (SoE) Report which is compiled each year. The NSROC councils cumulatively spend over \$134 million dollars each year on environmental actions within the region (NSROC Regional State of Environmental Report 2005/06).

Both the population environmental impact study and the regional SOE note the significant stress the environment is under due to human habitation and on-going development. Additional population growth will exacerbate this. At present there is a dearth of good quality environmental data within the region and no air quality monitoring stations are active within the North Region. Significant regional actions, commitments and funding are need within a state and federal legislative framework encompassing climate change, carbon trading and adherence to renewable energy are required if any measure of future sustainability is to be achieved.

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.

## **Subregions/Urban Renewal**

NSROC supports the creation of Subregions as a key component of the Metropolitan Strategy. While a strong preference remains for subregions which respect ROC boundaries, 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 this 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. In its own Sub-regional Planning Strategy NSROC has identified 22 Planning Policies and 6 Key Strategic Issues to guide development in the region. Further clarity on urban renewal and integrated urban infrastructure to achieve sustainability would be appreciated.

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. New communities should be created 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 NSDSS has been developed to provide a more detailed set of planning directions following the release of the Metropolitan Strategy for Sydney in December 2005. The Metropolitan Strategy 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; and
- 550,000 new jobs

Its full set of actions is provided in Appendix 1 to the NSDSS. The NSDSS has identified specific housing and employment targets for each council which provides welcome clarity for local government in completing their own planning instruments. While the NSDSS does provide a comprehensive planning 'snapshot' of the region, it draws most of its actual commitments from the State Infrastructure Strategy (SIS) released in May 2006. The Department of Planning has repeatedly stated that concordance between the two documents is only about 70% but that this is supposed to improve as both documents are revised and as state agencies review their forward budgets and action plans. While it is hoped that there will eventually be full concordance between the two documents the primary concern remains that the SIS is only a ten year strategy with a funding commitment that extends only four years. Councils remain in the invidious position of having to plan for 30 years of population growth with the commitment of only 10 years worth of infrastructure.

Current debate about the viability of key components of the SIS (such as the North West Railway line) and the changes made by the government to previous guaranteed projects (such as the truncation of the Epping to Chatswood Railway line) further underline the concern that regions are

being forced to accept high levels of urban consolidation in the absence of adequate infrastructure provision.

The NSW State Plan, released in November 2006, provided overarching goals for all state planning, 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 NSW State Plan has received some criticism for its lack of substance however it does contain some specific targets relating education, health, policing, natural resource use and other financial, environmental and social issues. Its relationship to the Metropolitan Strategy and more specifically the NSDSS is marginal as the NSDSS does not contain any of the same targets, is not articulated using the same sectoral divisions, and as the North Subregion is not covered by any of the nine specific regional delivery plans identified on page 152 is not subject to the proposed reporting mechanisms.

The Urban Transport Statement (UTS) also released in November 2006, proposed new infrastructure, strengthening of eighteen transport corridors and a new Centre for Transport Planning and Product Development. The Urban Transport Statement specifically identifies the connection of the M2 to the F3 and the connection of the F3 to the M7 as key planning projects and these are identified in the NSDSS. However in the absence of timelines, specific budgets and delivery dates for these critical pieces of infrastructure, the traffic issues in the North region are likely to remain. Considerable community cynicism exists due the comprehensive failure of the state government to provide integrated transport solutions and a number of the projects identified in the NSDSS such as the Epping-Chatswood Rail Link and the Lane Cove Tunnel are only of nominal value in terms of what they deliver for the residents of the North Sub-region, and are better suited for inclusion in the Inner North Sub-regional Strategy.

NSROC recommends that the NSDSS include targets similar to those identified in the State Plan (see comments regarding Implementation Plan later in the submission) as well as infrastructure commitments that extend beyond the life of the SIS. The only substantial commitments in the NSDSS for transport infrastructure have already been announced or are near completion, and with the exception of the (possible) North-West Railway Line, are likely to be completed over the next five years. Such commitments are insufficient to underpin the Metropolitan Strategy and the subregional strategies as the majority of future urban consolidation is predicated on a series of efficient, attractive and sustainable public transport hubs, with the majority being heavy rail.

## **Population targets**

Both Ku-ring-gai and Hornsby councils are planning to meet the targets identified within the NSDSS and NSROC commends the Department on providing clear targets for individual councils. However the housing targets table (Table 9) on page 52 includes a note that the dwelling targets have not been endorsed by the Councils. This is not the case as both councils have endorsed their targets.

There does remain a broad concern regarding the impact of 21,000 additional dwellings in the region on issues such as social cohesion, environmental sustainability, community infrastructure and utility provision. A regional dwelling increase of the proposed scale in the NSDSS will generate unsustainable levels of through and local traffic on the Pacific Highway, Pennant Hills Road, New Line Road, Boundary Road, Castle Hill Road, Carlingford Road and Epping Road as well as the Northern Sub-regions local road networks, and will thus 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. Rather it is left to councils to devise these criteria for themselves (broad guidelines have been developed in the NSROC Subregional Plan). It is recommended that these criteria be prepared to assist “ground-truthing” the Strategy’s targets to ensure they are realistic and allow for local topography, environmental and built character considerations and other possible impediments. These guidelines could be provided in conjunction with the Metrix planning tool.

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 NSDSS’s draft mapping of such areas does not give confidence to NSROC, 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 NSDSS. 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. As mentioned previously, both Ku-ring-gai Council and Hornsby Council are currently working together to develop a more contemporary and detailed employment analysis of the region. Final employment targets should be determined through consideration of the study’s findings. 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**

NSROC 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 NSDSS 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;
- l) A strong focus on, and commitment to, active transport (bicycle and pedestrian) programs and infrastructure; and
- m) Harbour Link Cycleway.

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 Sub-region has substantial infrastructure for road, rail and some other transport services, this infrastructure is patch and will not be able to serve the North Sub-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.

NSROC would also like to reiterate the points made in the Local Government Inquiry 'Are Councils Sustainable' completed in May 2006. This important report revealed the extent to which NSW local government is struggling to manage and renew its own infrastructure. The primary cause for the infrastructure maintenance shortfall is rate-pegging. Until councils are equipped with an adequate financial base to maintain the infrastructure required to service the community, and build new infrastructure to service additional population growth, the infrastructure crises in local government will continue to worsen. The issue is being further compounded by the expressed intent of the state government to cap Section 94 plans and limit the ability of councils to direct the funds towards regional infrastructure. The issue of local and state infrastructure maintenance needs to be addressed in a meaningful way, and funding for new infrastructure needs to be identified.

Specific concerns in the NSDSS include the following:

- 1) The Warren Centre at the University of Sydney has suggested that a longer term and sustainable solution for the M2 to F3 link should be a Fast Rail Link between Sydney and Newcastle. The rail link is identified in the Northern Sydney Subregional Planning Strategy and should be addressed in the Strategy.
- 2) Although the objective is to increase capacity and public transport along strategic bus corridors, the Strategy does not specify what improvements will occur in the Northern Sub-region. The statements relating to this objective are general and have no timeframe.

3) Main roads in the Northern Sub-region face congestion due to high demand for inter regional travel. There are several locations in the region that are pinch points, however the only pinch points noted in the Strategy are along the Pacific Highway at the F3 connection and between Pymble and Chatswood. In addition to Pennant Hills Road, the routes along New Line Road, Boundary Road, Castle Hill Road, Carlingford Road and Epping Road experience severe congestion during peak periods. Sections of these routes warrant upgrades. However, they are not included in the sites earmarked for improvement.

4) The NSDSS does not mention a timeframe for implementation of the rail link between Epping and Parramatta. This link was intended to be constructed as part of the Chatswood to Epping Link but was deferred. The link is required to contain travel by private vehicles between Parramatta, Hornsby and Chatswood regions and should be addressed in the Strategy.

5) A single Sydney Transport Authority, as proposed by the state opposition, should be implemented to co-ordinate and integrate all modes of transport, so as to avoid each mode being planned and operated in a competitive and self-serving manner. The on-going failure of the integrated ticketing solution for Sydney mentioned on page 69 of the NSDSS is emblematic of the anticipated delays and failures in delivering key significant transport infrastructure due to such a lack of integration.

## **Environmental Sustainability**

NSROC remains concerned that the issue of environmental sustainability has not been adequately addressed within the NSDSS. 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). In its draft form the NSDSS does not include consideration of the philosophy of carrying capacity or quantify the impacts of increased population in environmental, social or economic terms. The current approach accepts that there will be a reduction in standard of living for people in the area.

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.

Both Hornsby Shire Council and Ku-ring-gai council are recognised as leading councils in New South Wales in terms of the broad and innovative range of environmental and sustainability programmes and actions which they are implementing or have committed to. The key direction included in the NSDSS 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'. Furthermore the background information on the environment (page 78) excludes both air quality and climate change and there is no mention of water quality as an issue, nor is there provision for methods to mitigate any adverse effect on waterways as part of implementing the NSDSS.

The NSDSS has identified a range of key environmental issues from waterways to sea level rise. The majority of these actions revolve around the development of innovative sustainable approaches and developing strategies which currently do not exist. The NSDSS requires councils to develop strategies to address these problems, but gives no guidance as to what is expected, nor does it identify how such actions are to be resourced. The absence of an overarching state-wide strategy to address key issues such as climate change, and the absence of significant funding inherently detracts from the ability of councils to address these issues.

## **Housing Affordability**

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. The NSDSS states that the State Government will develop initiatives to provide for affordable housing through its Affordable Housing Framework. A focus on housing affordability in recent times from the state government has been to reduce supply side costs to the development industry with the expectation that these reduced costs will benefit the purchaser.

This does not work in the North Sub-region where the high value of the properties means such savings represent a small fraction of the purchasing cost and where the construction of new housing (as opposed to consolidated housing) is rare. The alternate focus of providing first time home buyers grants and incentives has also proved unsuccessful in the region again due to the high purchase prices and because of the overall inflationary impacts such measures have on the first home buyers market. 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 NSDSS.

## **Active Open Space and Sportsfields**

The NSDSS emphasises that Councils should make better use of the existing public open space areas, either by embellishment, more linkages and access. There is therefore an assumption that the proposed additional population (both working and residential) will be adequately serviced by these improvements, rather than additional open space areas being provided. The management of current open spaces and conservation areas; a commitment to energy and water policies that protect environment and natural resources; the cultivation and promotion of cultural activities 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 cycle-ways; bus shelters; the under-grounding 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 NSDSS should identify the demand for additional open space and identify mechanisms for its acquisition.

As 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 NSDSS does not adequately address the additional active open space requirements of the region, if it is to sustainably manage the proposed population increase of 21,000 households. The proposed actions in the NSDSS are better suited to regions where green field sites are still being planned, or where land purchase is economically viable.

The NSDSS should refer to the NSW Department of Infrastructure Planning and Natural Resource's 'Assessing Sydney's Recreation Demand and Opportunities', August 2004. This 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. The draft Strategy should also include a review of park and open space planning in Sydney by the DOP, taking a whole of government approach that addresses the inability of local government to continue to fund the supply and development of regional parks.

State Government capital financial assistance is required to meet the larger scale cultural and civic infrastructure needs of the North Sub-region. This is especially significant in the face of the revised framework for levying development contributions (Section 94 of the EP&A Act). The intent of the new framework is to reduce the level of development contributions and the types of infrastructure that can be levied under Section 94 and importantly, the possibility that the revisions will exclude "social" infrastructure and public art.

## **Governance**

The NSDSS provides a number of actions for implementing, managing and updating the strategy, however most are statements of the Department's current planning responsibilities. Critical to the governance issue is a detailed implementation programme including details of the timetable for implementation of the proposed actions as well as a statement of priorities, funding and delivery responsibilities. It should also clarify when the State Government will release the studies, guidelines and policies necessary for Councils to undertake more detailed planning.

The NSDSS should also identify financial assistance mechanisms to enable Councils to implement the costly and resource intensive actions required under the Strategy. The continued impost of rate-pegging and the shortfall in budgets for adequate infrastructure maintenance and construction identified in the recent Local Government Inquiry highlight the difficulty in councils funding additional strategic planning and data gathering as envisaged throughout the NSDSS.

While NSROC acknowledges that the Department of Planning meets with the ROC Presidents to provide a point of contact in regard to the Metropolitan Strategy as a whole, a specific sub-regional governance structure which includes state agencies and local government with specific responsibilities to deliver outcomes through the NSDSS should be considered.

In its draft form the NSDSS relies on the provision of services by other government agencies. However, it does not place commitments on those State government agencies. The Department's difficulties in coordinating the actions of other State government agencies are acknowledged. The draft Strategy should acknowledge that concessions to councils may be required, should critical infrastructure not be provided by State agencies in a timely manner. State agencies should be held to account for failures to deliver critical infrastructure in the same way as the State is holding local government to account through changes to planning law, publication of key performance data and threats or actions to remove planning powers, install administrators or determine major projects without community and council input.

## **Implementation Plan**

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 NSDSS' 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.

A significant concern for NSROC is the absence of an implementation plan for the NSDSS. While the Strategy contains many proposed actions none are provided with a delivery date, performance measure, budget or clear identification of responsibility. The provision of an accompanying implementation plan is the single most important addition the department could make to improve the draft strategy.

## **Review**

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. NSROC recommends that a broader range of criteria are included in the Strategy and that all of them are reviewed at the end of the five year period. These would include criteria relating to each of the five key directions.