

DRAFT METROPOLITAN STRATEGY FOR SYDNEY TO 2031

NORTHERN SYDNEY REGIONAL ORGANISATION OF COUNCILS RESPONSE

NSROC welcomes the opportunity to comment on the Draft Metropolitan Strategy for Sydney 2031 and recognises the need for a clear and sustainable vision to guide Sydney's growth over the next 20 years.

First and foremost it should be made clear that there is much within the Draft Strategy NSROC Councils support. The concept of a Metropolitan Strategy for Sydney and the coordination of such a strategy with other State Government plans, in particular *NSW 2021: A plan to make NSW number one* (NSW 2021), the *State Infrastructure Plan 2021-2032* (the State Infrastructure Strategy) and the *NSW Long Term Transport Master Plan* (the Long Term Transport Master Plan). Provided these plans are implemented by agencies in a timely fashion, this positive and sensible approach should lead to improved policy consistency on population growth, employment, land use, infrastructure and transport.

However this will require higher levels of collaboration with local government and coordination across NSW agencies than has been evident in recent years. For example, achievement of the jobs targets under the current North Sydney LEP is predicated on the upgrade of North Sydney railway station, however there is no new transport works identified in the Draft Metropolitan Strategy or the Long Term Transport Master Plan to support the addition of commercial floor space, and the jobs that would result.

NSROC supports the thoughtful and articulate submissions lodged in response to the Draft Metropolitan Strategy by its member Councils, highlighting both positive and negative aspects of the Strategy. This NSROC submission does not repeat in detail those individual NSROC Council submissions but rather focuses on some of the key concerns shared by the region's Councils in relation to the Draft Strategy, in particular with respect to the proposed new subregional groupings and the need for infrastructure to be provided in support of housing and employment targets.

Subregions

The Draft Strategy states that the six Sydney subregions have been determined based on shared growth challenges and an assessment of population and economic catchments. They vary in size from three to seventeen Local Government Areas (LGAs). For each subregion there are population, housing and employment growth targets and policies and actions to facilitate priorities for the metropolitan area, and for the Major Centres, specialised precincts and city shapers located within the subregion.

The NSROC Councils of Hornsby and Ku-ring-gai are proposed to be part of a North subregion which also includes Manly, Pittwater and Warringah Councils. The remaining NSROC Councils of Willoughby, Lane Cove, Hunter's Hill, Ryde and North

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Sydney are located under the Draft Strategy within the proposed Central Sydney subregion, composed of seventeen LGAs. This region is claimed to reflect the economic geography of Sydney and the Global Economic Corridor, with Sydney Harbour as a unifying feature.

The Draft Metropolitan Strategy endeavours to locate population, housing and employment growth within strategic centres and specialised precincts supported by existing and planned transport and infrastructure networks. It also seeks to ensure that each subregion is supported by a Major Centre and/or Regional City so as to promote a more sustainable region with lower employment leakage and reduced journey to work distances/times for residents.

The North subregion is supported by the northern parts of the Main Northern, North Shore and Epping to Chatswood railway lines. The North subregion contains two Major Centres , Hornsby and Dee Why , but does not benefit from a Regional City or Centre of a higher status like other subregions resulting in significant employment leakages beyond the proposed subregion.

With respect to the Central Sydney subregion NSROC requests change to a more workable subregional grouping on the basis of these points:

- The proposed subregion is totally inconsistent with *NSW 2021* and the Regional Action Plans which are based on the Northern, Northern Beaches, Southern Sydney, Eastern Sydney and Inner West. These subregions better recognise existing regional networks and services.
- The subregion bears no relationship to the existing groupings in the Regional Organisations of Councils where long-established and effective lines of communication and cooperation already exist.
- Community consultation would be difficult in terms of physical constraints such as travel times and other logistical considerations, leading to an inability to engage meaningfully about specific issues of concern to a very large population of over 1.1 million people.
- The Planning White Paper identifies a representative from each Council plus four expert advisors and a Chair on each subregional planning board. In the case of the Central Sydney subregion this amounts to a board of 22 members. NSROC considers such a subregional board structure as impractical and sub optimal for effective collaboration and decision-making..
- Communities need to feel an allegiance to the subregion. Communities are unlikely to feel any sense of identification with other areas within such a large subregion or to see themselves as part of it in any meaningful sense. The subregion should be based on “communities of interest” and how well infrastructure allows for cohesion across the region..

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- The proposed Central Sydney subregion does not align with any State Government boundaries or environmental, catchment, infrastructure or historical boundaries.
- The justification for the Central Sydney subregion relies on links to the “iconic Harbour and Global Economic Corridor”, but this argument can only be made on a scale of a region not a subregion. It is far too big and contains so many disparate components that is unlikely to build strategic capacity or ever achieve community or local government acceptance as a recognisable subregion.

Having regard to matters such as governance, growth management, service delivery, infrastructure provision and community consultation, NSROC’s preferred position is that a subregion be formed by grouping all of the 11 LGAs of the Northern Sydney Regional Organisation of Councils (NSROC) and the Shore Regional Organisation of Councils (SHOROC) to form a Northern Sydney subregion. This subregion would be composed of the Council areas of Hornsby, Kuring-gai, Manly, Pittwater, Warringah, Mosman, North Sydney, Willoughby, Lane Cove, Ryde and Hunter’s Hill. NSROC and SHOROC have been operating successfully for over 20 years and have established clear regional identities which offer the building blocks for an effective planning subregion.

This grouping of LGAs would better facilitate the growth strategies contained in the Draft Metropolitan Strategy as it is supported by most of the railway lines and main roads connecting Global Sydney to the Major Centres north of the Harbour, including the Global Economic Corridor. The grouping of LGAs is serviced by the Major Centre of Chatswood, which operates as Sydney’s Northern Regional City. Indeed, Chatswood’s role as Northern Sydney’s Regional City for retail, transport hub, regional employment centre and regional performing arts should be formally acknowledged within the centres typology, a point made in previous consultations between NSROC and the NSW Government.

Housing targets

The Draft Metropolitan Strategy sets an ambitious target of at least an additional 545,000 houses across Sydney by 2031. This is a significant increase (17%) on the current Metropolitan Strategy. Minimum targets for both 2021 and 2031 have also been set for the subregions of Sydney. The Strategy identifies that local government housing targets are to be determined by Subregional Delivery Plans and that a greater mix of housing, including affordable housing, will result in areas supported by infrastructure.

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The Strategy provides a commitment to infrastructure and this is reflected in the Planning White Paper which also advocates a stronger link in the timing of planning and the delivery of infrastructure. The recently released NSW Division of Local Government Infrastructure Audit Report estimates the local government infrastructure backlog to be some \$7.4billion as at June 2012. A commitment by NSW agencies to more effective integration of infrastructure delivery between levels of government toward shared housing growth targets is critical to the successful delivery of the Draft Strategy and is strongly supported.

The proposed Planning legislation envisages that the NSW Government will create State Infrastructure Plans based on new Subregional Plans prepared by combined State/Council Subregional boards. Without such Subregional Infrastructure Plans detailing major State and Council infrastructure and funding mechanisms for delivery of the identified infrastructure it will be difficult for Councils to confidently commit to achieving increased housing numbers. Also needed are disaggregated dwelling targets for individual LGAs so that local level planning can support overall regional outcomes.

Much progress has already been made throughout the NSROC region in delivering increased housing numbers in support of the current Metropolitan Strategy. Acknowledgement of annual housing provision under the current Metropolitan Strategy already achieved within the NSROC area to date should be included in new housing targets for 2011-2031 in the finalisation process..

Importantly, before finalisation of new housing targets for LGAs and subregions, sufficient time needs to be allowed for an extensive community consultation process under the processes to establish both the sub-regional and local plans. .

A properly resourced and sophisticated community engagement process to create the sub regional plan must be conducted before local government plans can be prepared with certainty. This is in keeping with the process envisaged by the Planning White Paper and included in the Exposure Drafts. It is essential that an entirely new strategic planning consultation process informed by effective community engagement is conducted to verify whether LGAs can accept additional housing beyond those targets already embedded in current local planning instruments..

Employment targets

Critical to achieving productivity and economic growth is offering a range of employment opportunities close to where people live. Extended journey to work times have been shown to impact negatively on business productivity and the challenges of contemporary family and community life. An essential performance measure for the Metropolitan Strategy must be ensuring improvement in the vigour

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of Sydney's economy and providing capacity for jobs growth and diversity across Sydney, based on improved public transport infrastructure.

The Draft Strategy proposes a minimum of 22,000 new jobs by 2021 and a minimum of 39,000 by 2031 for the proposed North subregion. Within the proposed Central Sydney subregion a further 135,000 additional jobs are proposed by 2021 and some 230,000 by 2031.

Setting minimum employment targets for subregions is potentially a powerful tool for long term job provision matching economic opportunity and skills across Sydney. However, in order to achieve an open and transparent planning process, the methodology used to determine and allocate employment targets to subregions must be discussed with councils and made publicly available. This will help to restore confidence and integrity in the planning system, as highlighted in NSW 2021, assist those charged with developing local government reform policy and help councils to apply the findings at the local level.

A number of locations within the NSROC area designated for jobs growth have limited scope to change the size of their commercial core, making it difficult to see how such jobs targets can be achieved. A further understanding of how the targets were derived would be helpful in assessing achievability from an evidence base and, as necessary, renegotiating targets

It cannot be stressed enough that infrastructure and transport needs to be in place before planned growth targets can be achieved. It is not economically or environmentally sustainable to continue to retrofit critical infrastructure, as is happening in many areas of Sydney.

This is best practice urban design and where this has occurred in the past growth targets have been achieved. Macquarie Park is an example of how local and regional infrastructure developed in step with expansion brings benefits to residents and the broader region. Improved regional infrastructure has supported growth over a number of years in Macquarie Park. The past success of the area was linked to its access to regional road networks. However, for the past 20 years traffic congestion has been a limiting factor for the growth and competitiveness of the area. Recent introduction of rail infrastructure to the area has allowed the City of Ryde to plan for additional growth adjacent to the railway stations. These rail infrastructure upgrades provide the opportunity for further growth if access and availability to public transport continues to improve over time.

Individual NSROC Council submissions highlight transport as a significant issue for residents and a range of transport needs are identified that would better enable the achievement of housing and employment targets. Whilst not all repeated here,

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attention is drawn to NSROC support for the Parramatta to Epping rail link as an important transport and infrastructure initiative. The North West rail link, a transit network extension from Brookvale to Chatswood, and a second Sydney Harbour rail crossing are also viewed as critical developments to underpin achievement of the housing and growth targets for northern Sydney. NSROC is also a strong supporter of the Orbital Motorway link from the M2 to the F3, which will reduce congestion throughout the area.

NSROC believes that the Metropolitan Strategy should tackle the issue of a second Sydney Airport at Badgery's Creek. Such a development would be a major employment generator, housing growth generator and contributor to infrastructure services and global connectivity for the whole of NSW.

Climate change

The rescission of the NSW Sea Level Rise Benchmarks and associated Flooding and Coastal Erosion Guidelines has left a void in relation to local councils being given clear guidance on planning for climate change-related sea level rise. The action to review the Towards a Resilient Sydney project should ensure planning guidelines are identified in the Subregional Delivery Plans to address sea level rise.

Conclusion

NSROC is pleased to have the opportunity to make this submission on the Draft Metropolitan Strategy for Sydney 2031 and reiterates its broad support for a Strategy, provided that it is properly coordinated with other State Government Plans, in particular *NSW 2021*, the *State Infrastructure Plan 2021-2032* and the *NSW Long Term Transport Master Plan*.

The particular concerns raised in this submission are important to the NSROC group of Councils and we look forward to thoughtful consideration of the issues raised so that northern Councils can play their part in ensuring that the final Metropolitan Strategy for Sydney 2031 is as effective as possible in enabling the achievement of its worthy objectives.

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