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23 April 2010

The Hon Kristina Keneally MP  
Premier  
Minister for Redfern Waterloo  
Governor Macquarie Tower  
1 Farrer Place, Sydney NSW 2000

cc. Minister for Transport, Minister for Planning

Dear Premier

**SHOROC submission on the Metropolitan Strategy Review-Sydney Towards 2036 discussion paper and Metropolitan Transport Plan**

SHOROC, a partnership of Manly, Mosman, Pittwater & Warringah Councils, welcomes the opportunity to comment on the Metropolitan Strategy discussion paper and the Metropolitan Transport Plan. Please find attached a copy of SHOROC's submission.

The SHOROC councils have reviewed the Metropolitan Strategy Review-Sydney Towards 2036 discussion paper and the discussion questions raised, the draft Metropolitan Transport Plan, the existing Metropolitan Strategy and draft sub-regional strategies and our submission focuses on the following key areas:

- Background on the SHOROC region now and challenges ahead
- 6 key issues that need to be addressed to enable our region to meet our current challenges, enable this growth in population to occur and adapt to the impacts of climate change.
- Areas of the Metropolitan Strategy and its approach supported by SHOROC
- Areas for improvement of the Metropolitan Strategy and its approach
- Specific comments regarding the questions raised in the discussion paper
- Specific comments regarding the Department of Planning's investigation of Frenchs Forest as a Major Centre.

Local government will play a pivotal role in the future of greater Sydney including the planning and implementation of the Metropolitan Strategy. SHOROC councils would appreciate your response and would welcome further discussion with the NSW Government on the matters raised in this submission. We would also welcome a strong collaborative partnership approach to implementation of priority strategies to address the issues facing our region now and for the future.

Yours sincerely

Ben Taylor  
SHOROC Executive Director



**SHOROC submission**  
**2010 Metropolitan Strategy Review**  
**2010 Metropolitan Transport Plan**

**23 April 2010**

## Overview of SHOROC's submission

SHOROC welcomes the opportunity to comment on the Metropolitan Strategy discussion paper and the Metropolitan Transport Plan. Based on a review of the Metropolitan Strategy discussion paper and the discussion questions raised, the draft Metropolitan Transport Plan, the existing Metropolitan Strategy and draft sub-regional strategies, our responses have been grouped to focus on the following key areas:

- Background on the SHOROC region now and challenges ahead
- 6 key issues that need to be addressed to enable our region to meet our current challenges, enable this growth in population to occur and adapt to the impacts of climate change.
- Areas of the Metropolitan Strategy and its approach supported by SHOROC
- Areas for improvement of the Metropolitan Strategy and its approach
- Specific comments regarding the questions raised in the discussion paper
- Specific comments regarding the Department of Planning's investigation of Frenchs Forest as a Major Centre.

Local government will play a pivotal role in the future of greater Sydney including the planning and implementation of the Metropolitan Strategy. SHOROC councils would welcome further discussion with the NSW Government on the matters raised in this submission and a strong collaborative partnership approach to implementation of priority strategies to address the issues facing our region now and for the future.

## The SHOROC region now and challenges ahead

SHOROC is a partnership between the councils that make up the region of the Northern Beaches from Bradleys Head to Barrenjoey - Manly, Mosman, Pittwater and Warringah councils.

This region covers an area of approximately 288km<sup>2</sup>, has a population of around 265,000 people, is home to around 100,000 jobs and is characterised by a high proportion of residents that live and work locally. It has an outstanding natural environment, vibrant community, large influx of tourists and weekend visitors and makes a significant contribution to global Sydney.

Critical issues now: There are a number of critical issues for the region which need to be addressed now to maintain its liveability and sustainability, to enhance its contribution to and integration with greater Sydney and enable future challenges to be addressed.

These include the significant road congestion, limited and inefficient public transport as well as the lack of access to an appropriate and accessible high quality health service. This is emphasised by the fact that Brookvale/Dee Why, the region's designated major centre under the existing Metropolitan Strategy, is reliant on buses as the only form of public transport and is the only major centre in greater Sydney not serviced by a rail line.

Population growth and climate change will compound the pressure on our region in the years ahead. The next decades see significant challenges including:

- An expected population increase to over 300,000 by 2031 and almost 310,000 by 2036, along with the need for additional dwelling and employment capacity as detailed in the existing 2005 Metropolitan Strategy of:
  - an additional 17,900 dwellings (plus growth in Warriewood/Ingleside)
  - an additional capacity for 20,800 jobs.

- Climate change and its predicted effect on sea levels, coastal erosion and weather patterns and resultant impacts including displacement of housing and other coastal and low lying land.

Liveability and sustainability are valued highly by the SHOROC community and councils. Any strategy for the region and greater Sydney should maintain and enhance these characteristics as the region grows including:

- Maintaining and enhancing quality of life, wellbeing, the high proportion of jobs close to home and access to social services, recreation, infrastructure and transport.
- Increasing engagement, involvement and connectedness of community members and development of social capital.
- Seeking to improve housing choice in response to demographic changes such as the availability of affordable housing for a diversity of households, including key workers.
- Creating more sustainable communities with more appropriate management of the region's water, energy, waste, open space, cultural and natural resources, encouraging greater residential and business conservation practises and adaptive re-use, and investigation of the viability of providing water, energy and waste recycling services within the region.
- Maintaining the biodiversity and quality of bushland and waterways, and protecting bushland corridors across the region.

## **6 priority issues that need to be addressed for the SHOROC region and Sydney**

There are 6 key issues that need to be addressed and incorporated into the Metropolitan Strategy planning and implementation to meet the current challenges for our region, enable this growth to occur in a cost-effective, timely and sustainable manner, and enable effective and appropriate adaptation to the impacts of climate change:

1. Targeted investment in public transport and priority major road infrastructure from the NSW and/or Commonwealth Governments, with the priorities including:
  - Fast public transport links for the East/West corridor from the major centre of Dee Why/Brookvale to Frenchs Forest, Chatswood, Ryde and CBD phased in consistent with demand and the level of growth in the region.
  - Improved North-South public transport services to improve reliability, travel times and accessibility.
  - Grade separation at the intersections of Wakehurst Parkway and Warringah Road, required now and also a critical part of the construction of the Northern Beaches Hospital, and Warringah Road and Forest Way.
  - Mona Vale Road upgrade to a divided dual-lane carriageway for its full length through to Mona Vale to improve safety and efficiency, and enable Warriewood/Ingleside growth.
  - Unclog road pinch points including along the Spit-Military Road corridor.
  - Strategic planning and more investment in park and ride facilities.
2. Immediate construction of the level 5 Northern Beaches Hospital at Frenchs Forest and associated road infrastructure works (highlighting the need for integrated land use and transport planning); appropriate upgrades required to enable the long term complementary

role for Mona Vale Hospital, networking effectively with the new Northern Beaches Hospital; and provision of community health facilities at the Manly Hospital site.

3. Clear policy direction and increased investment and resourcing of climate change data collection and analysis, adaptation and mitigation measures due to the significant impact climate change is likely to have on our region due to our large areas of coastal and low lying land, leading potentially to displacement of housing and employment areas and open space.
4. Development of a detailed implementation plan agreed between and committed to as a partnership by councils, the NSW Government and Commonwealth Government for delivery of the priority infrastructure for the region including clear funding mechanisms, delivery timetables and responsibilities. While the draft sub-regional strategies sought to establish more detail and were a move in the right direction, the lack of a strong funding commitment and an agreed delivery plan approved by the NSW Cabinet meant that key elements such as the Northern Beaches Hospital have not been delivered and there is little certainty for stakeholders involved.
5. Resourcing from the NSW Government for a strategic analysis in partnership with the SHOROC councils to establish most appropriate centres for the region, their role and assess any proposals for urban renewal and new centres to improve the region's integration with greater Sydney without compromising the values held high by the community – our regions way of life and outstanding natural environment.
6. Coordinated assistance for the councils to drive employment generation to enable the targets for employment capacity to be met whilst maintaining the high containment – the proportion of residents that live and work locally - due to concerns that time and funding constraints will be a barrier to employment growth.

These are critical issues for the SHOROC region and local government will play a pivotal role in the planning and implementation of the Metropolitan Strategy. SHOROC and our member councils are able to provide more information on these key issues and proposed solutions and would welcome a strong collaborative partnership with the NSW and Commonwealth Governments to develop and implement evidence-based strategic planning for our region.

### **Areas of the Metropolitan Strategy and its approach supported by SHOROC**

SHOROC supports the principle of developing and delivering a Metropolitan Strategy as an integrated and coordinated long term strategic plan for greater Sydney, including the:

- focus on sub-regional planning and encouragement of regional cooperation
- centres-based approach including hierarchies and a focus of increased densities around the centres and strategic transport corridors
- housing and jobs targets, allowing councils to accommodate projected growth in the most appropriate manner for their local area or region
- measures to address affordable housing and housing choice, significant issues for our region
- use of strategic land use and release areas
- efforts to engage with local government and other key stakeholders in the process of development and implementation.

## Areas for improvement of the Metropolitan Strategy and its approach

SHOROC identified significant deficiencies and failures in a review of the progress of the 2005 Metropolitan Strategy, its draft sub-regional strategies and the elements of the updated strategy outlined in the 2010 Metropolitan Strategy Review discussion paper and the Metropolitan Transport Plan. Areas for improvement include:

- The Metropolitan Strategy should be the over-arching strategic document encompassing all major NSW Government strategies and commitments for greater Sydney, including transport, housing, economic growth and healthy and sustainable communities and environments outlined over the short, medium and long term.

While the discussion paper makes a good start in this regard by stating that the intention is to integrate the Transport Plan with the Metropolitan Strategy, this intention has been stated before and not delivered effectively and the integration should also be greater than just with transport. For example the draft Plan does not make particular reference to recently proposed major sites under the draft North East Sub-Regional Strategy such as the proposed Northern Beaches Hospital site at Frenchs Forest and the need for improved public transport connections and how this will be achieved.

The discussion paper also has a strong focus on economic development and should clearly incorporate environmental and social strategies into the planning considerations, such as planning for increased pressure on health services and water and energy utilities.

- There is a need for a stronger connection and clear integration with other strategic documents including the NSW State Plan, State Budget, State Infrastructure Strategy, planning for the Growth Centres, Council Community Strategic Plans and LEPs. There should also be a strong connection and clear alignment with the National Capital Cities Strategic Planning Criteria and other appropriate Federal planning criteria and plans. It would also assist with consistency and implementation if the Metropolitan Strategy were to retain the same structure and numerology for its revised objectives and actions such that it is consistent and compatible with the next tier of actions in the Subregional Strategies.
- There is a need for a strong funding commitment and delivery plan approved by the Cabinet as part of the Strategy to provide certainty for all stakeholders involved in its delivery.
- The inclusion of meaningful performance measures and audits should be a key element to enable the benchmarking and tracking of performance of the measures in the Strategy against agreed indicators, enabling transparent and continual review and improvement. Real reporting against these measures should be part of any review such as this process. Forecasting data should also be funded and collated from the bottom up to ensure it is robust, realistic and transparent. This will support evidence-based strategic planning and provide data that is consistent across Council areas and sub regions within the Metropolitan region.
- The allocation of sub-regions should be determined in partnership with local government as a key partner in the implementation of the Metropolitan Strategy and be consistent for all areas of planning. In this regard the North East subregion should include Mosman LGA as there is already an existing collaborative partnership between these four councils under SHOROC and there are significant implications for Mosman of planning decisions made in the Manly, Warringah and Pittwater LGAs and vice versa, especially in the area of transport.
- There is a need for the NSW Government to transparently demonstrate it is making planning decisions in the interests of the State and its people as there are public perceptions that

planning is being unduly influenced by private investment and this is undermining the integrity of the planning process and the ability of all stakeholders including local government to plan strategically for the future.

- Consideration should be given to the accommodation of innovative funding mechanisms for local government to enable it to adequately fund the infrastructure improvements it is responsible for on a regional and local scale. The need for new funding arrangements is evident for example in the coastal areas of Sydney where councils subsidise local tourism and economic sustainability by funding the improvements and maintenance of coastal infrastructure and services along our beaches and tourism areas from the rate base.
- Local government should have a stronger role in the development and implementation of key elements of the Metropolitan Strategy. Councils have significant experience in strategic planning, a good understanding of the local community, local region and local needs as well as State and Federal priorities and should be provided the scope to identify and deliver the appropriate regional housing and employments targets in the most appropriate manner.
- The Metropolitan Strategy should be the driver for the protection of the environmental and cultural heritage of the Sydney Basin. Economic and social objectives can best be achieved with complementary actions to protect the traditional built character of the region and its physical setting. These unique assets contribute significantly to the liveability of Sydney for the residential population but are also a major element of the attraction of Sydney for global industries. The Metropolitan Strategy should seek to balance the demands of population growth and increased density with the needs of existing communities and the character of successful places, villages and towns.
- State owned land which may become available for other uses within the time frame of the Metropolitan Strategy should be the subject of a thorough environmental planning and community needs assessment prior to redevelopment or adaptive re-use. This is consistent with the COAG Criteria for Future Strategic Planning of Capital Cities which requires “health, liveability and community wellbeing” and “matters of environmental significance” to be addressed in strategic planning systems and is important as Commonwealth funding will be tied to these criteria and they will be used to review the performance of strategic planning systems.

### Specific comments and concerns on the questions raised in the discussion paper

This submission does not separately address all the questions raised in the 2010 Metropolitan Strategy discussion paper. However there are certain issues that warrant comment which are discussed below. Reference should also be made to any submissions made by SHOROC’s member councils; Manly, Mosman, Pittwater and Warringah councils.

- *Question: Should Sydney continue to accommodate the majority of population growth in NSW? What are the alternatives?*

*Response:* SHOROC councils accept that it is somewhat inevitable that a large percentage of the population growth in NSW will occur in Sydney having regard for the availability of employment, resources and services located in and around the Sydney region.

However, given the region’s lack of appropriate and effective public and road transport, land use constraints and difficulty in providing contained employment opportunities, the population, housing and employment targets for the region should not be increased beyond that in the 2005 Metropolitan Strategy.

- *Question: 10a) What should be the key characteristics of an urban renewal authority (e.g. Sydney Metropolitan Development Authority)?*

*Response:* SHOROC is generally opposed to the formation of the proposed Metropolitan Development Authority however there is insufficient detail on the proposed authority to make an informed decision on its appropriateness. This concept is generally not supported as it would appear to have a number of implications for strategic planning and our region including: that it would potentially remove decision making on local planning issues from the local community; has the potential to disrupt considered, evidence-based regional plans; and could mean that any such authority pre-empts re-zoning decisions with targeted land purchase.

It is suggested that the NSW Government invite Councils to comment on the proposed Authority, following the preparation of a draft framework for its composition, functions and operations. Should the NSW Government decide to form the proposed authority, its focus should be on ensuring delivery of state government responsibilities and infrastructure in partnership with local government, with its key characteristics including the following:

- Operations should be transparent, non-partisan and non-profit motivated – any profit generated should be invested into public infrastructure facilities
- Cross-sectional representation including significant local government representation
- Clear terms of reference which are exhibited
- Regular and clear public reports to parliament
- Consistency with constitutional and legal requirements.
- Clear governance, roles, responsibilities and funding arrangements.

### **Specific comments regarding the Department of Planning's investigation of Frenchs Forest as a Major Centre**

In a letter to Warringah Council dated 1 April 2010, the Department of Planning requested Warringah Council provide comments in regard to the Department's decision to investigate the potential for a major centre in the Frenchs Forest employment area.

Any decision to investigate Frenchs Forest has regional implications particularly in the areas of health and transport and as such should involve Pittwater, Manly and Mosman Councils and SHOROC in addition to Warringah Council.

Comments on this proposed investigation and the proposed 'Frenchs Forest Planned Major Centre Investigation Area' are as follows:

- It is noted that Frenchs Forest is currently identified as a 'small village' in the draft North East subregional strategy and is the location of the planned Northern Beaches Hospital.
- The role of Frenchs Forest should be considered as part of a larger strategic analysis of the region in partnership with the SHOROC councils to establish the most appropriate centres for the region and their role, including infrastructure needs. It may also be more appropriate due to the location of the planned Northern Beaches Hospital that Frenchs Forest be investigated as a specialised center (described in the Metropolitan Strategy as '*Areas containing major airports, ports, hospitals, universities, research and business activities that perform vital economic and employment roles across the metropolitan area.*').
- The timing of any investigation process needs to be considered. This is particularly critical due to the upcoming development by Warringah Council in consultation with the community of a Housing Strategy to detail how it will meet its Metropolitan Strategy

housing target of 10,300 new dwellings by 2031. In addition, any investigation would have implications for Dee Why/Brookvale and should be deferred until the development potential of Dee Why and Brookvale has been determined and appropriate controls are in place to allow for the existing housing and employment targets to be met.

- Key stakeholders in any investigation process are Pittwater, Manly and Mosman Councils and SHOROC in addition to Warringah Council due to regional implications for health and transport infrastructure.

### **For more information**

Local government will play a pivotal role in the future of greater Sydney including the planning and implementation of the Metropolitan Strategy. SHOROC and our member councils are able to provide more information on these key issues and proposed solutions and would welcome a strong collaborative partnership approach to implementation of priority strategies to address the issues facing our region now and for the future.

For more information contact Ben Taylor, SHOROC Executive Director on (02) 9905 0095 or email [admin@shoroc.nsw.gov.au](mailto:admin@shoroc.nsw.gov.au)