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28 June 2013

Mr John Turner
Chair
Local Government Acts Taskforce
Locked Bag 3015
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Dear Mr Turner and Taskforce

Submission on the *A New Local Government Act for NSW Discussion Paper*

SHOROC is a partnership of Manly, Mosman, Pittwater and Warringah councils led by a Board of the council Mayors and General Managers. Collectively we represent a population of 280,000 residents who contribute over \$20 billion annually to the NSW economy, and a region of over 288km².

I write on behalf of SHOROC to provide input from a regional perspective in response to the *A New Local Government Act for NSW Discussion Paper*.

The key regional proposals in the Discussion paper and SHOROC's comments are as follows:

- **Proposal 3.3.4: Formation and Involvement in Corporations and Other Entities.** It is noted the Taskforce has deferred further consideration of this issue until the work of the Independent Panel is completed.
 - SHOROC considers there is a need to strengthen regional governance options to, as identified by the Independent Local Government Review Panel, *support the work of councils and facilitate more efficient and effective State-local relations, especially in strategic planning, economic development, infrastructure provision and service delivery.*
 - There are numerous potential models being used across Australia and Internationally. These include models such as New Zealand's Council Controlled Organisations, Queensland's Council of Mayors or South Australia's Regional Subsidiaries, or models being used in NSW such as Incorporated Associations, Corporations, County Councils, Joint Ventures, Alliances or Cooperatives.
 - This reform is an opportunity to take the strong elements of all the models available locally and internationally, to build on the strength and resources already established by councils through their ROCs, and to create purpose built legislation for regional collaboration or significantly re-write County Council provisions to create and facilitate a framework for stronger regional collaboration.
 - It is recommended that the Taskforce together with the Independent Review Panel define a range of incorporation models for regional collaboration and propose

amendments to the NSW Local Government Act that facilitate the transitioning of existing ROCs for stronger regional collaboration.

- The Attached submission to the Independent Panel's *Future Directions for NSW Local Government* report proposes potential governance options for facilitating stronger regional collaboration that should be considered in defining the range of incorporation models for regional collaboration in the Act. Major potential options include a 'Council of Mayors' type model, 'Regional Services Organisation' for operational and joint services, a significantly revised County Council framework, and Corporations under the Corporations Act.
- **Proposal 3.3.10: Procurement.** SHOROC supports the proposals of the Taskforce that the Act be revised so to facilitate improved procurement through:
 - (i) the adoption of a more principles-based enabling approach to procurement combined with a medium level of regulation designed to ensure support of the principles of value for money, efficiency and effectiveness, probity and equity, and effective competition.
 - (ii) in relation to the current tendering threshold of \$150,000 rather than the legislation setting a dollar value threshold a more flexible principles-based approach be taken to councils setting the threshold based on risk assessment of the proposed procurement.
 - (iii) the delegations section of the Act be reviewed to facilitate councils entering into collaborative procurement arrangements such as via ROCs and allowing councils to delegate procurement to general managers with a 'report back' mechanism.
 - (iv) any regulation of council procurement support councils utilising available technologies that can assist with efficient, effective and economic procurement processes that are accessible to all relevant stakeholders and are fair, open and transparent.
- SHOROC strongly supports in particular the proposed review of the delegations section of the Act to facilitate councils entering into collaborative procurement arrangements such as via ROCs and allowing councils to delegate procurement to general managers with a 'report back' mechanism.

We would welcome further discussions with the Taskforce on the recommendations discussed in this submission. For further information or to arrange a meeting please contact Mr. Ben Taylor SHOROC Executive Director on (02) 9905 0095 or ben.taylor@shoroc.com.

Yours sincerely

Cr Michael Regan
SHOROC President, Mayor of Warringah

cc. The Hon Don Page MP, Minister for Local Government



SHOROC Submission

Future Directions for NSW Local Government

June 2013

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1. Introduction to SHOROC

SHOROC is a partnership of Manly, Mosman, Pittwater and Warringah councils established in 1996 and led by a Board of the council Mayors and General Managers. Legally constituted as an Incorporated Association we collectively represent a population of 280,000 residents who contribute over \$20 billion annually to the NSW economy. Our region covers an area of approximately 288km² in north east Sydney and is characterised by its outstanding natural environment and vibrant communities.

The major focus of SHOROC under our 2012-16 Corporate Plan is to:

- *Make our region stronger* by securing funding for construction of public transport, roads and hospitals, and delivering projects to improve business, communities and the environment.
- *Make our councils stronger* by helping improve their financial sustainability and services for the community, through regional purchasing, projects and by exploring and delivering shared services on a regional scale.
- *Make our business stronger* by increasing business operations to improve our financial position.

Our primary roles are regional advocacy, intergovernmental relations, strategic planning and coordinating joint projects and services.

SHOROC has a strong history of success. This includes development of the first regional strategy *Shaping Our Future*, securing over \$600 million of NSW Government investment in local health and transport infrastructure, the formation of Kimbriki Environmental Enterprises Pty Ltd to sustainably manage the region's waste, significant cost savings for councils through joint tendering and projects, and management of joint campaigns, reports and projects to achieve outcomes for the region.

2. SHOROC opposes forced amalgamations

SHOROC and our member councils oppose forced amalgamations.

The Board has adopted a policy that member councils should continue to collaborate regionally on policy and operational issues as an alternative to forced amalgamations.

3. Overview of this submission

This submission focusses on regional issues relating to the Independent Local Government Review Panel's *Future Directions for NSW Local Government* report.

Specific comments are provided on opportunities to provide greater strategic capacity for councils by building stronger regional organisations to address the issues raised by the Panel.

The submission is structured to provide comments as follows:

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Whether amalgamations occur or not is a matter for individual councils, their communities and the NSW Government. It is understood individual submissions will also be provided by SHOROC member councils.

4. The current ROC arrangements and the Panel's report

The role of regional partnerships and greater strategic capacity

SHOROC endorses the need for reform in the local government sector, for improvements to the whole system of local government and the strategic capacity of councils to support their communities.

It is positive that the Panel has recognised the importance of regional organisations as essential elements of an effective system of local government, including the need for:

- *“Regional groupings of councils that share resources on a large scale and jointly plan and advocate for their regions*
- *A Local Government Act that minimises prescription and provides a range of options for the way councils and regional bodies are structured*
- *Effective mechanisms for State-local consultation, joint planning, policy development and operational partnerships”*

It is also encouraging that the Panel acknowledges the role of regional organisations in supporting councils to build the key elements of strategic capacity, particularly *effective regional collaboration, credibility for more effective regional advocacy* and being a *capable partner for state and federal agencies*.

ROCs currently fulfil this role to varying degrees and SHOROC has a strong history of success, particularly with joint advocacy, intergovernmental relations and regional strategic planning.

Intergovernmental relations in particular has improved significantly in recent years with the new NSW Government, as acknowledged by Gooding Davies (2012) whereby *a number of government agencies such as the Department of Planning and Infrastructure and Transport NSW are adopting policy and planning processes with a regional focus and are increasingly engaging with local government through ROCs*.

However there is a need to strengthen the regional governance model if councils are to play a long-term strong partnership role with the state and federal governments in strategic planning and delivery of infrastructure and services.

SHOROC agrees with the Panel that *stronger regional governance must be a central plank of local government reform* in order to *support the work of councils and facilitate more efficient and effective state-local relations, especially in strategic planning, economic development, infrastructure provision and service delivery*.

SHOROC supports the creation of a *more robust, statutory framework at the regional level*, of providing flexibility for councils to determine the best approach depending on the varying needs of communities and regions.

However, the options proposed by the Panel to achieve this are not considered appropriate.

Rather it is recommended the Panel define a range of incorporation models for regional collaboration and propose amendment of the NSW Local Government Act to facilitate the transitioning of existing ROCs for stronger regional collaboration.

One size doesn't fit all – the priorities for northern Sydney

The Panel has rejected the 'one-size-fits-all' approach from the beginning.

However the *Future Directions for NSW Local Government report* does just this for regional organisations, proposing 'new-look county councils' as replacements for ROCs all over NSW.

While SHOROC endorses the major reasons for reform as outlined above, it is considered the county council model does not meet the needs of councils. Greater investigation and consultation with ROCs and councils in individual areas is needed before an appropriate business model can be determined for that local area.

Considering the Panel's report and supporting research, the priority issues to be addressed for the Northern Beaches and northern Sydney councils and regional organisations are:

- Playing a stronger strategic role in metropolitan governance and planning
- Advocating with a united voice on behalf of their communities
- Being a more effective partner with state and federal governments on infrastructure and service delivery
- Removing duplication of services and improving productivity and effectiveness.

Long-term financial sustainability while an issue to be addressed, is not identified as the ultimate driver for this region.

Councils should be able to determine the most appropriate model for a regional organisation based on these needs, within a framework or range of options established by the government.

The Panel should recommend a range of options to be established for councils to choose from based on needs of the region in question.

SHOROC is a strong regional organisation with proven results

SHOROC has a strong history of success, particularly in the areas the Panel considers critical for local government reform: regional planning, advocacy and intergovernmental relations.

The Panel states on page 8 of its report that major factors in *Strategic Capacity* are *effective regional collaboration, credibility for more effective advocacy, capable partner for state and federal agencies and advanced skills in strategic planning and policy development.*

The councils through SHOROC have in recent years for example:

- Developed the first high-level subregional strategy in response to the Metropolitan Strategy, *Shaping Our Future*, to take the lead on integrated regional land use and infrastructure planning by bringing together major directions for housing, employment, transport and health.
- Partnered with local NSW and commonwealth MPs to agree on the regional infrastructure priorities, establishing a regular Ministerial/Mayoral Forum to progress regional priorities and sitting on high-level NSW Government project committees including the Bus Rapid Transit pre-feasibility study project control group and Northern Beaches Hospital Inter-agency Working Group.
- Advocated with a united voice for:
 - Funding for major health and transport infrastructure, which has resulted in the NSW Government:
 - Committing to build a major new \$600M Hospital at Frenchs Forest by 2018 and retain Mona Vale Hospital in a complementary role.
 - Planning major public transport and road upgrades, including allocating \$3M for Bus Rapid Transit feasibility studies, over \$7.5M for major road upgrade planning, and requesting Infrastructure NSW engage with the private sector to potentially build a major new tunnel for Spit/Military Road, Sydney's most congested corridor.
 - Incorporating transport infrastructure for the region in the Long Term Transport MasterPlan and Metropolitan Strategy for the first time in decades.
 - Regional service priorities to be included in the NSW 2021 Northern Beaches Regional Action Plan, which resulted in all SHOROC priorities being included in the plan for delivery by the NSW Government over the coming years in collaboration with SHOROC and councils.
 - Changes to major policies and strategies, including the Metropolitan Strategy, NSW Planning System Reform Green and White Papers, NSW Infrastructure Strategy and NSW 2021 Regional Action Plan.

- Coordinating regional projects and campaigns in collaboration with the state government including development of regional youth, ageing, tourism, and waste strategies and between the councils including regional sustainability strategy, 'health of the region' indicators and regional employment and transport studies.

The councils through SHOROC have also made good gains on major projects and resource sharing and productivity improvements to support financial sustainability of member councils, including:

- Regional waste management coordination and operations:
 - Forming Kimbriki Environmental Enterprises Pty Ltd (KEE) to sustainably manage the region's waste, managed by an independent board with the councils as shareholders. KEE is progressing a major project to construct Alternative Waste Treatment facilities on site over the coming years to process and recycle waste from across the region and manage the landfill in perpetuity.
 - Resolving to implement a new common waste collection system across all four councils, with regional tender development, communication programs and investigations into a potential shared service model for waste management underway.
- Joint procurement, projects and resource sharing:
 - Establishing a regional procurement program which currently procures and contract manages over \$20M in regional contracts and services, from road construction and maintenance to records storage and cash collection, resulting in significant productivity gains, business improvements and direct cost savings for councils.
 - Managing regional collaborative projects and working groups including environmental management projects, training, recruiting regional code of conduct panels, auditors, and working regionally on tourism and economic development.
- Business reform and shared services investigations:
 - Implementing a regional business reform program which is currently reviewing opportunities for shared services including waste collection management, call centre, development application assessment, compliance and building certification and regional coastal zone/catchment management services.

Plans for improving regional performance and governance

SHOROC acknowledges there is a need to improve the form and function of regional organisations, and there is scope to significantly improve the effectiveness of SHOROC, regional collaboration and in turn the strategic capacity of our member councils.

The current membership, geographic scale and governance model of SHOROC is under review and the Board has initiated discussions with neighbouring NSROC regarding the potential merger of the two organisations or establishing another regional grouping of northern Sydney councils.

Central to this review is the objective to establish a stronger regional organisation with greater capacity for regional planning, advocacy and intergovernmental relations, providing the scale to achieve greater economies of scale for joint services and procurement, and an improved governance structure.

The Metropolitan Strategy subregions and the new NSW Planning System are a key consideration in this review, particularly the objective of facilitating an effective partnership between the state and local governments for strong strategic subregional planning.

SHOROC considers that the Metropolitan Strategy should define two subregions for northern Sydney to enable effective collaboration on regional strategic planning and advocacy as:

- The key criteria for the subregions should be maximising effective management of growth, service delivery, integrated planning and provision of infrastructure, ability to consult effectively and the best governance arrangements to address the relevant community of interest.

- The new proposed Northern Sydney subregion outlined in the draft Metropolitan Strategy is supported, (includes Manly, Warringah, Pittwater, Ku-ring-gai and Hornsby councils)
- A new 'Inner-North' subregion is proposed which includes Mosman, North Sydney, Ryde, Willoughby, Lane Cove and Hunters Hill councils.
- The proposed Central subregion is strongly opposed as there is no clear community of interest or links between the communities concerned, critical to effective community engagement in subregional planning. It does not align with NSW Government planning regions for health, education or NSW2021 and will not facilitate more effective infrastructure planning.
- A larger regional organisation aligned to the two new subregions (North and Inner-North) would enable the councils to effectively coordinate and integrate transport and land use planning for northern Sydney, building on the strong results to date in regional strategic planning and advocacy.

Attached for further information are SHOROC's submissions on the NSW Planning Reform White paper and the Draft Metropolitan Strategy (**Tab A** and **Tab B**).

As outlined above, a number business case assessments have also been initiated into shared services.

A major hurdle to improve SHOROC's operations is the limitations of the current legal governance models available to councils to build stronger, more robust and effective regional organisations.

Alternative models are required that facilitate the transitioning of existing ROCs for stronger regional collaboration.

Significant concerns in proposed county council solution for metropolitan Sydney

It is noted that the Panel envisages current ROCs transitioning to or being replaced by 'new look' county councils.

While it may appear the county council provisions in the Local Government Act are flexible and appropriate for meeting the objectives of the Panel in its report, SHOROC does not consider it meets the needs of metropolitan councils. Major issues and concerns include:

- County Councils are established by the state government as a body politic of the state, answerable to the state, creating a perception of a fourth tier of government and removing a key strength of current regional organisations in that they are creations of councils for councils.
- Membership of the governing body is restricted to elected councillors, whereas the functions proposed for county councils are largely operational and would be more effectively overseen by council executives or independents with appropriate skills and experience.
- Councils are potentially weakened by the removal of powers, rather than strengthening them.
- Functions are limited to those that can be classed as a function and wholly delegated to the county council and not duplicated by the constituent council, meaning for example 'advocacy,' 'high level corporate services' 'procurement' and 'training' would not be able to be regionally implemented as they would need to be undertaken by member councils in some capacity for efficiency purposes, ruling out a significant proportion of regional programming delivered by ROCs, alliances and other collaborations of councils.
- There is limited flexibility or adaptability once established in regard to functions and services as well as funding streams from constituent councils.
- The scale proposed for the potential Northern Beaches County Council would not maximize the strategic capacity elements the panel is seeking to achieve as it is too small.

SHOROC argues it is more effective to build on the strength, experience and resources already in place. To reinforce structures and facilitate the strengthening or transitioning of the organisations already established to perform many of the services promoted by the Panel.

5. Building stronger regional collaboration

SHOROC considers there is a need to strengthen the regional governance model, as identified by the Panel to *support the work of councils and facilitate more efficient and effective state-local relations, especially in strategic planning, economic development, infrastructure provision and service delivery.*

Stronger regional governance is needed regardless of whether council amalgamations occur or not.

SHOROC supports the creation of a *more robust, statutory framework at the regional level*, providing flexibility for councils to determine the best approach depending on the varying needs of communities and regions.

There are numerous potential models being used across Australia and internationally such as New Zealand's Council Controlled Organisations, Queensland's Council of Mayors, South Australia's Regional Subsidiaries and models being used in NSW such as incorporated associations, corporations, county councils, joint ventures, alliances or cooperatives.

This reform is an opportunity to take the strong elements of all the models available locally and internationally, to build on the strength and resources already established by councils through their ROCs, and create purpose built legislation for regional collaboration or significantly re-write county council provisions to create a framework for stronger regional collaboration.

The focus should be on building on the successes to date, on sensible changes to strengthen local government by creating more robust collaboration with a greater capacity to plan, to advocate, to partner with state and federal governments, and to achieve economies of scale and scope for joint services, purchasing and projects.

Governance options for regional collaboration

It is recommended the Panel define a range of incorporation models for regional collaboration and propose amendment of the NSW Local Government Act to facilitate the transitioning of existing ROCs for stronger regional collaboration.

Major potential options proposed may include:

- *Council of Mayors* type model for regional advocacy, strategic planning and intergovernmental relations, led by a board of council mayors appointed for a four-year term as per the Regional Planning Boards.
- *Regional Services Organisation* for operational and joint services, governed by a skills-based board. Councils are shareholders, appointing delegates to the board, approving the annual Statement of Intent and holding it accountable by using performance measures and targets. These Regional Services Organisations could also resource the Council of Mayors through an advocacy and planning coordination unit. The New Zealand Council Controlled Organisation framework and the South Australian Regional Subsidiary framework provide good guidance on potential provisions for the Act.
- A *revised county council framework* which significantly re-writes the provisions so the organisations are created by and answerable to councils, rather than established at the discretion of the NSW Government. This will also enable flexibility in the appointment of board members to be council executives or independents, proportional voting structures and the functions to be adaptable over time to the needs of councils, and streamlining reporting requirements under IP&R.
- *Corporations* established under the Corporations Act where appropriate, with guidelines established that support and facilitate councils forming corporations in line with the guidelines without the need for an onerous Ministerial approval process.

6. Comments on other proposals from the Panel

SHOROC supports a number of the other proposals outlined in the Panel's report, particularly in regard to initiatives to improve council financial sustainability. Comments from a regional perspective are below and it is understood individual submissions will also be provided by councils.

SHOROC supports the following recommendations by the Panel:

- **Sustainability and finance**
 - 5.1 Support developing a standard set of sustainability benchmarks.
 - 6.4 In principle support for the establishment of a statewide financing agency, subject to further detail on the agency governance and function.
- **Infrastructure**
 - 7.1 Support maintaining the Local Infrastructure Renewal Scheme (LIRS) for at least 5 years, with a focus on councils facing the most severe problems.
 - 7.3 Support investigating the Queensland model of Regional Roads Groups, as well as options for cost savings through strategic procurement initiatives.
- **Promote innovation, productivity and competitiveness**
 - 8.3 Support preparation of NSW Local Government Workforce Strategy.
- **Productivity and improvement**
 - 9.1 Support development of consistent data collection and performance measurement systems for NSW councils along similar lines to the current Victorian initiative, and in accordance with the Destination 2036 Action Plan.
- **Metropolitan governance**
 - Comments provided above regarding building stronger regional organisations.
 - Support establishment of a Metropolitan Council of Mayors to provide a 'voice' for Sydney, to represent local government and local communities in high-level consultations with state and federal governments, as well as internationally.
- **Refocus Local Government NSW**
 - 19.1 Support efforts to 'revitalise' LGNSW with a focus on proactive, policy based initiatives to strengthen the sector's capacity and credibility and to collaborate with regional organisations to engage more closely with all councils across NSW.

SHOROC Submission

Draft Metropolitan
Strategy for Sydney to
2031

June 2013

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1. Introduction & background

SHOROC is a partnership of Manly, Mosman, Pittwater and Warringah councils led by a Board of the council Mayors and General Managers. We collectively represent a population of 280,000 residents who contribute over \$20 billion annually to the NSW economy.

Our region covers an area of approximately 288km² in north east Sydney and is characterised by its outstanding natural environment and vibrant communities and as such regional and local planning are of major importance.

Local government will play a pivotal role in the future of greater Sydney. SHOROC welcomes the opportunity to provide a submission on the Draft Metropolitan Strategy for Sydney to 2031 and its proposals for the future of Metropolitan Sydney.

Shaping Our Future – the regional strategy for transport, health, housing and jobs

In 2010 the councils through SHOROC developed and all formally adopted *Shaping Our Future* to take the lead on integrated regional land-use and infrastructure planning by bringing together major directions for housing, employment, transport and health.

Shaping Our Future links council planning for future housing and employment growth together with major infrastructure planning, focussing on hospital planning and the major transport infrastructure priorities for our region. It was developed through an evidence-based spatial analysis and planning process conducted by experienced council staff in partnership with expert planning consultants.

Shaping Our Future outlines a clear direction for the future of the Northern Beaches and Mosman based on significant analysis of regional constraints and opportunities as well as decades of on-the-ground experience and studies.

While it is understood the Subregional Delivery Plans are envisaged to be more detailed than this strategy, *Shaping Our Future* forms a strong base on which to build and its major infrastructure priorities should be included directly in the North Subregion section of the Metropolitan Strategy. It also demonstrates the outcomes that can be achieved by councils collaborating through ROCs and working in partnership with the NSW Government on infrastructure planning and delivery.

This submission

The submission is structured to provide comments as follows:

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| 5. Working in partnership to deliver the strategy | Page 10 |
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2. Major comments regarding the Metropolitan Strategy

Major comments regarding the *Draft Metropolitan Strategy for Sydney to 2031* are outlined below. Further detail is provided in the subsequent sections.

2.1 Support for the Metropolitan planning approach

SHOROC supports the overall approach and principle of developing and delivering a Metropolitan Strategy as an integrated and coordinated long term strategic plan for greater Sydney. This is further strengthened by the proposal that the Strategy and Subregional Strategies be established as statutory documents.

Many of the objectives of the Draft Strategy are also supported, particularly those that promote and enable integrated land use and infrastructure delivery, greater connectivity, encourage subregional planning and cooperation, focus increased densities around centres and strategic transport corridors, facilitate healthy and resilient environment, and encourage increased containment and local job creation.

2.2 Strategic planning for Sydney's north

Existing high-level subregional plan for the Northern Beaches and Mosman. SHOROC has developed *Shaping Our Future* as a high-level regional strategy for transport, health, housing and jobs and this should form the base for the planned Subregional Delivery Plan. It also demonstrates the outcomes that can be achieved by councils collaborating through ROCs and working in partnership with the NSW Government on infrastructure planning and delivery.

Infrastructure priorities for the SHOROC region. *Shaping Our Future* identifies the major infrastructure priorities for the Northern Beaches and Mosman and these should be clearly identified in the Metropolitan Strategy, particularly the subregional priorities sections and maps, for subsequent inclusion and implementation under the Subregional Delivery Plan. Comments are as follows:

- SHOROC supports the inclusion of the Northern Beaches Hospital including the major new Frenchs Forest campus and the creation of an associated Specialised Precinct. However, the complementary campus of the Hospital at Mona Vale should also be identified in the Strategy.
- SHOROC welcomes the Draft Metropolitan Strategy's inclusion of transport infrastructure improvements for the region and the goal of strengthening connections with Global Sydney and the Global Economic Corridor. The focus on providing mass-transit on the Pittwater/Spit/Military Rd corridor and extending it to the Warringah Road corridor is strongly supported.

However, to achieve the overarching goal to address significant congestion now and enable future growth, there is a need to deliver these key transport upgrades for the region in the short-term, not in the medium to long-term, and these priorities should be detailed in the Strategy. Further detail on the justification for the major regional transport priorities are detailed in **Section 3** below. In summary the priorities are:

- A Bus Rapid Transit system across the region including on the north-south Pittwater/Spit/Military Road corridor from Mona Vale to the CBD, and from Dee Why to Chatswood via Warringah Road.
- Grade separation at the intersections of Warringah Road with Wakehurst Parkway and Forest Way and upgrades to Wakehurst Parkway to provide flood-free access, critical to the construction of the Northern Beaches Hospital at Frenchs Forest.
- Mona Vale Road upgrade to a divided dual-lane carriageway for its full length.
- The proposed Northern Beaches Link from the Gore Hill Freeway to the Burnt Bridge Creek Deviation via a tunnel under Mosman and a new bridge over the Spit, combined with the BRT from the Northern Beaches to the CBD.
- Construction of targeted park and rides to maximise patronage of public transport.

Housing and employment planning and targets. The job and housing targets allocated to the North Subregion appear reasonable on face value provided this growth is supported by adequate infrastructure. However transparency is needed in regard to how the targets were derived and significant work will be required to allocate the targets across the region and with the LGAs. In addition, analysis of the regional centres and transport constraints clearly shows that growth should be limited until major public transport and road upgrades are delivered. Employment growth is a focus for this region and SHOROC would welcome a partnership with the NSW Government to develop a regional employment strategy.

There is very limited detail and direction in the subregional map and these should include further detail including infrastructure and town centres such as Manly, Mona Vale and Mosman.

Proposed new subregional groupings and review of ROCs. SHOROC has reviewed the proposed subregions to identify how to best achieve the objectives of the Metropolitan Strategy and the new Planning System. Key criteria are maximising effective management of growth, service delivery, integrated planning and provision of infrastructure, ability to consult effectively and the best governance arrangement to address the relevant community of interest. Due regard must also be given to the Local Government Reform program. Based on these criteria (see Section 3.3), SHOROC:

- Supports the new proposed Northern Sydney Subregion outlined in the draft Metropolitan Strategy which includes Manly, Warringah, Pittwater, Ku-ring-gai and Hornsby councils.
- Strongly opposes the proposed Central Subregion as there is no clear community of interest or links between the communities concerned, critical to effective community engagement in subregional planning. It does not align with NSW Government planning regions for health, education or NSW2021 and it will not facilitate more effective infrastructure planning.
- Argues that a new 'Inner-North' Subregion should be established which includes Mosman, North Sydney, Ryde, Willoughby, Lane Cove and Hunters Hill councils.

Councils are also currently exploring opportunities to merge SHOROC and NSROC or to transition to an alternative grouping of northern Sydney councils due to the improved integrated planning, joint services and purchasing outcomes that could be achieved. The proposed subregions above would enable the councils to collaborate to effectively coordinate and integrate transport and land use planning for northern Sydney.

2.3 Phased and integrated land use and infrastructure planning

SHOROC strongly supports the integration of transport and land use in the Metropolitan Strategy and Subregional Delivery Plans. To achieve this it is critical the new Subregional Delivery Plans truly integrate and phase infrastructure delivery under a fully-funded commitment by the NSW Government together with housing and employment delivery by councils. For example a Subregional Delivery Plan may include council zoning land parcels for increased housing density in stages over time, with progression to the next stage subject to delivery by the NSW Government of a planned road or public transport upgrade.

2.4 Working in partnership to deliver the strategy

SHOROC supports a clear link and integration between the Metropolitan Strategy and other policies such as the Long Term Transport Masterplan, State Infrastructure Plan and NSW2021 Regional Action Plans.

The Strategy represents a rare opportunity to re-write the way in which State and Local Government can cooperate to deliver effectively for the community. SHOROC would welcome a true partnership approach to developing and implementing Subregional Delivery Plans between councils and the NSW Government.

There is a need to ensure each action has clear accountabilities for delivery in terms of the agency responsible and agreed timeframes and funding commitments. A detailed implementation plan should be 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.

3. Strategic planning for Sydney's north

As outlined above, the SHOROC councils have conducted significant analysis of the challenges and opportunities for our region in Sydney's north east as we seek to work together to plan for its future. In 2010 the councils through SHOROC developed and all formally adopted *Shaping Our Future* as the regional strategy for housing, employment, transport and health and the comments below are based on the priorities agreed in this strategy.

3.1 Infrastructure priorities for the SHOROC region to be included in Metropolitan Strategy

Comments in regard to chapters on Balanced Growth, Productivity & Prosperity, Accessibility & connectivity

The biggest issues for our region are undoubtedly transport and health services, with significant road congestion, limited and inefficient public transport as well as the lack of equitable access to an appropriate and accessible high quality health service.

The SHOROC councils are open to meeting appropriate targets for growth in housing and jobs in our region. However current road congestion and lack of fast and reliable public transport doesn't allow it, as any growth would impact on communities and place even more pressure on the road network which is already seeing local businesses considering relocation to more accessible areas.

SHOROC supports the planned Northern Beaches Hospital and Frenchs Forest Specialised Precinct. The councils have been advocating for this new hospital for many years and welcome its imminent construction.

The current congestion surrounding the planned hospital and specialised precinct site are major barriers to any development in this area. Targeted road upgrades to Warringah Road and Wakehurst Parkway, together with high frequent mass-transit along the Warringah Road corridor, are required before this development can proceed.

An omission from the Strategy is the other complementary hospital campus at Mona Vale which should be identified in the Northern Subregion section of the Strategy as a major piece of the subregion's health infrastructure planning.

Transport upgrades are needed now to address current issues and enable appropriate future growth.

SHOROC welcomes the Draft Metropolitan Strategy's inclusion of infrastructure improvements for our region for the first time in decades and the goal of strengthening connections with Global Sydney and the Global Economic Corridor. The focus on providing mass-transit on the Pittwater/Spit/Military Rd corridor and extending it to the Warringah Road corridor is strongly supported.

However, overall the Strategy is very limited in regard to transport infrastructure for our region. To achieve the overarching goal, to address significant congestion now and enable future growth, there is a need to deliver key transport upgrades for the region in the short-term, not in the medium to long-term, and these priorities should be detailed in the Strategy.

The need for action now is supported by the Draft NSW Long Term Transport Master Plan and recent Transport for NSW studies which highlight the transport infrastructure backlog:

- The Pittwater/Spit/Military Road corridor from Mona Vale to the CBD is the most congested in Sydney based on the Long Term Transport Masterplan's volume/capacity ratio figures, and the second slowest morning peak hour commute of all the major corridors.
 - The 28 km bus journey on this route can take an hour-and-a-half to reach the CBD, compared to public transport travel times to the CBD of 51 minutes from the south or 31 minutes from the west.
 - This corridor links the region's major centre, Dee Why/Brookvale, with the CBD and should include a mass transit system such as BRT according to the hierarchy presented in the Transport Master Plan.

- The Warringah Road corridor is already beyond capacity through Forestville and the rest of the corridor, particularly the Wakehurst Parkway and Forest Road intersections, will exceed peak demand capacity by 2016 without any action.
 - This corridor is the link between two major centres in Dee Why/Brookvale and Chatswood and is used as a major access route for business in the area, making it a key factor in regional economic development and employment.
 - On top of this in the next year we'll see work begin on a major level 5 hospital at Frenchs Forest, bringing with it additional housing and employment growth where traffic is at its worst.
- Congestion is impacting local business operations and large local businesses are considering relocation outside of the region. This will mean a loss of local jobs, impact our ability to meet future employment capacity targets and in turn place even more pressure on the congested transport network.
- Incremental improvements in the bus network in the short-term will not address these issues and will not be acceptable to community which has been calling on the NSW Government to deliver solutions for years.

The transport priorities: Bus Rapid Transit and targeted road upgrades. Key regional transport priorities are included at **Attachment 1**. In summary the priorities are:

- A Bus Rapid Transit system across the region including on the north-south Pittwater/Spit/Military Road corridor from Mona Vale to the CBD, via a median bus lane using tidal flow arrangements in peak hour, and from Dee Why to Chatswood via Warringah Road.
- Grade separation at the intersections of Warringah Road with Wakehurst Parkway and Forest Way and upgrades to Wakehurst Parkway to provide flood-free access, critical to the construction of the Northern Beaches Hospital at Frenchs Forest.
- 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.
- The proposed Northern Beaches Link from the Gore Hill Freeway to the Burnt Bridge Creek Deviation via a tunnel under Mosman and a new bridge over the Spit, combined with the BRT from the Northern Beaches to the CBD.
- Construction of targeted park and rides to maximise patronage of public transport.

The Warringah Road corridor must be given higher priority by the NSW Government and solutions brought forward to the next five years, not included as potential extensions sometime in the future.

- This is about more than just commuter travel it's about making this region work. This corridor is used as a major access route for business in the area, making it a key factor in regional economic development and meeting the Metropolitan Strategy employment targets. It is the link between two major centres in Dee Why/Brookvale and Chatswood, a major link to greater Sydney. Additional pressure will come from new employment and population growth associated with the proposed specialised centre at Frenchs Forest which includes the new Northern Beaches Hospital and Healthcare Precinct.
- The lack of due attention to the Warringah Road corridor congestion issue also conflicts with Transport for NSW's own recent studies which indicate this east-west corridor is at capacity now. The AECOM Frenchs Forest Specialised Centre reports – *Local Transport Assessment* and *Strategic Transport Assessment* – overwhelmingly conclude that the transport network around Frenchs Forest is already at capacity and needs significant investment in road infrastructure and public transport improvements, to accommodate background growth expected over the next five years. This investment is imperative given the expected development of a major hospital at Frenchs Forest, a fact supported by the BRT pre-feasibility report which states there is a fundamental need to redesign the bus network to serve the Frenchs Forest health precinct.

The Metropolitan Strategy must include a fully-funded commitment to delivering this priority infrastructure in our region if the councils are to accommodate the Metropolitan Strategy's housing and employment targets.

SHOROC argues that NSW Government planning for this region should be aligned to the regional priorities identified by councils in the *Shaping Our Future* strategy. This is due to the close connection to their communities and responsibilities for land use management and role in growing the economy, protecting the natural assets and building and maintaining vibrant, connected and safe communities.

3.2 Housing and employment planning and targets

Comments in regard to chapters on Balanced Growth, Liveable City, Productivity and Prosperity

The jobs and housing targets allocated to the North Subregion appear reasonable on face value provided this growth is supported by adequate infrastructure. It is unclear as to the appropriateness of the targets in the proposed Central Subregion as it is difficult to review because of the number of LGAs included in this region and lack of detail behind the targets provided.

SHOROC has a clear policy of seeking to create more jobs closer to home, maintaining or improving our containment levels to minimise pressure on major transport routes. However, analysis of the regional centres and transport constraints clearly shows that growth should be limited until major public transport and road upgrades are delivered. The ability to provide capacity for jobs is severely hampered by poor transport which limits and adversely impacts on business to the detriment of regional job capacity.

Currently almost 50% of residents work locally in the region and almost 80% of local jobs are performed by local residents.

Unfortunately the reality is that many businesses across the SHOROC region are telling councils that unless the severe transport congestion is addressed, their operations will no longer be commercially viable and they will need to relocate to an area that is more accessible. Businesses relocating outside of the region due to the poor transport accessibility, will place even more pressure on major transport routes as residents are forced to commute even further to work.

As such, it is vital that the Metropolitan Strategy include a clear and fully-funded commitment to providing a Bus Rapid Transit system and to upgrading Warringah Road and Mona Vale Road consistent with the *Shaping Our Future* strategy (as detailed in Attachment 1).

There is also a need for coordinated assistance for the councils to drive employment generation to meet the targets for employment capacity while 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.

One issue is growth and mixed use development in existing centres and planning new centres to meet growth and market demand. This is generally supported provided:

- Residential uses do not encroach on land zoned for commercial purposes to the detriment of local jobs
- The centres are supported by adequate infrastructure, including public transport services consistent with the Long Term Transport Master Plan's initiatives to support land use with transport.

There is very limited detail and direction in the subregional map and these should include further detail including infrastructure and town centres such as Manly, Mona Vale and Mosman.

Transparency is needed in regard to how the targets were derived and significant work will be required to appropriately allocate the targets across the region and with the LGAs. The methodology used to allocate housing targets to sub regions particularly must be discussed and made publicly available.

Under the proposed new Planning System, Regional Growth plans such as the Metropolitan Strategy are to be *“supported by other documents including agencies plans and studies, which will present detailed information on the region, including the main evidence and rationale for decision”*. This information is not currently available and should be publicly released to enable informed consideration of the proposals.

This will help to achieve the NSW 2021 State Plan goal of restoring confidence and integrity in the planning system. It will also help local councils communicate with their communities the need for more housing to accommodate a growing population.

3.3 Proposed new subregional groupings and review of ROCs

Comments in regard to chapter on Subregions

SHOROC has reviewed the proposed subregions to identify how the objectives of the Metropolitan Strategy and the new Planning System can best be achieved. It is considered the primary criteria for the subregional groupings are the most effective groupings to:

- accommodate/manage growth
- streamline and integrate service delivery between councils and the NSW Government
- integrate planning and provision of infrastructure, particularly transport
- enable effective and meaningful community consultation and engagement
- facilitate the optimal governance arrangement to address the relevant community of interest.

Due regard must also be given also to the local government reform program and the inter-dependence of councils within the potential subregions.

Based on these criteria SHOROC:

- Supports the new proposed Northern Sydney Subregion outlined in the draft Metropolitan Strategy which includes Manly, Warringah, Pittwater, Ku-ring-gai and Hornsby councils.
- Strongly opposes the proposed Central Subregion as there is no clear community of interest or links between the communities concerned, critical to effective community engagement in subregional planning. It does not align with NSW Government planning regions for health, education or NSW2021 and it will not facilitate more effective infrastructure planning.
- Argues that a new 'Inner-North' Subregion should be established which includes Mosman, North Sydney, Ryde, Willoughby, Lane Cove and Hunters Hill councils.

The proposed "Central" Subregion is inappropriate, unworkable and not supported due to the following factors:

- There is insufficient justification that the harbour and focus on economic activity in the subregion override the difficulties in appropriately planning for such a diverse region accommodating such a large population.
- Community consultation would be very difficult on this scale as the population is too big for meaningful consultation, going against the community participation focus in the proposed new planning legislation. Communities don't see themselves as part of the proposed region and as such will not be able to meaningfully participate in subregional planning.
- It will not be practical and feasible to effectively manage consultation/meetings across 17 councils and state agencies and make appropriate decisions having regard to the views of communities and the best outcomes for the subregion.
- The inclusion of the majority of economic activity within this subregion goes against the centres-based policy and promotion of decentralised employment of the Strategy by relegating the other subregions to 'feeder' regions for this central grouping.
- Difficulty of effectively planning transport and land use for northern Sydney as a whole as the Central Subregional grouping will likely have little regard to the directions of the North Subregion and its priorities in connecting with Global Sydney and the Global Economic Corridor.

SHOROC considers a significantly more effective arrangement is to establish a new 'Inner-North' Subregion which includes Mosman, North Sydney, Ryde, Willoughby, Lane Cove and Hunters Hill councils. Key reasons are:

- Creates considerably better opportunity for stronger integration of land use and transport planning, a key priority of the Metropolitan Strategy, and greater flexibility to plan employment and housing growth along priority transport corridors and major centres across northern Sydney to improve containment.
- Would enable the Inner-north and North Subregions to collaborate to integrate planning land-use, transport, health, education and other services on a broader scale, which would be very difficult if the inner-north councils were included in the Central Subregion. The potential creation of a ROC covering both these subregions would also enable this ROC to facilitate or lead this coordination process.
- Capacity for much stronger integration with other NSW Government service delivery and infrastructure planning, including alignment with NSW Health, NSW Education, and NSW2021 Regional Action Plan boundaries.
- Clear connections and communities of interest, making consultation more feasible. The North Shore and Northern Beaches, while distinct communities (and sub-communities) are strongly connected in regard to employment, housing, sport, recreation, education, health, and other aspects of people's daily lives. This significantly increases the likelihood of meaningful engagement for the significant consultation planned on a subregional level.
- Good existing working relationships between the councils and bodies such as SHOROC and NSROC to facilitate collaboration and coordinate subregional planning. Also more adaptable to any potential future changes in the form of local government.

Councils are also currently exploring opportunities to merge SHOROC and NSROC or to transition to an alternative grouping of northern Sydney councils due to the improved integrated planning, joint services and purchasing outcomes that could be achieved. The proposed subregions above would enable the councils to collaborate to effectively coordinate and integrate transport and land use planning for northern Sydney.

4. Phased and integrated land use and infrastructure planning

Comments in regard to chapters Balanced Growth, Liveable City, Productivity and Prosperity, Accessibility & connectivity

SHOROC strongly supports the integration of transport and land use in the Metropolitan Strategy and Subregional Delivery Plans.

As outlined above SHOROC is open to meeting appropriate targets for growth in housing and jobs in our region consistent with the targets in the Draft Metropolitan Strategy. However current road congestion and lack of fast and reliable public transport doesn't allow it as any growth would impact on communities and place even more pressure on the road network which is already seeing local businesses considering relocation to more accessible areas.

The issue to date has been there has not been a truly integrated process in place on a regional or local level. Councils are allocated broad region-wide housing and employment targets however transport planning decisions have already largely been made at a metropolitan level.

Councils then are in a situation where:

- They are unable to meet the allocated housing and employment targets as to do so would mean that local and regional roads cease to function, an issue that Warringah Council has identified for the Dee Why/Brookvale area, and the community will simply not accept additional growth without new transport infrastructure.
- Congestion impacts business operations, leading to business closure or relocation and loss of local jobs, further impacting councils' ability to meet future employment capacity targets and in turn placing even more pressure on the congested transport network.

It is critical the new Subregional Delivery Plans truly integrate and phase infrastructure delivery under a fully-funded commitment by the NSW Government together with housing and employment delivery by councils. For example a Subregional Delivery Plan may include council zoning land parcels for increased housing density in stages over time, with progression to the next stage subject to delivery by the NSW Government of a planned road or public transport upgrade.

To enable this to be planned and delivered effectively the Subregional Boards will need to include appropriate senior NSW Government representatives and the Subregional Delivery Plans must come with government/cabinet commitment to fully fund infrastructure before rezoning proceeds.

The Plans and process will also need to enable adaptability for major proposals, for example for potential unsolicited proposals such as the F3-M2 tunnel or proposed Northern Beaches Link.

5. Working in partnership to deliver the strategy

Comments in regard to chapters on Delivery Plan for the Strategy

SHOROC supports a clear link and integration between the Metropolitan Strategy and other policies such as the Long Term Transport Masterplan, State Infrastructure Plan and NSW2021 Regional Action Plans.

The Strategy represents a rare opportunity to re-write the way in which state and local government can cooperate to deliver effectively for the community.

SHOROC welcomes a true partnership approach to development and implementation of the Subregional Delivery Plans between councils and the NSW Government. The SHOROC councils have worked with the NSW Government in this way in recent years, developing a high-level version of a Subregional Delivery Plan *Shaping Our Future*, outlining directions for housing and employment growth and realistic infrastructure priorities, and then working in partnership with local MPs and the NSW Government for implementation of this infrastructure.

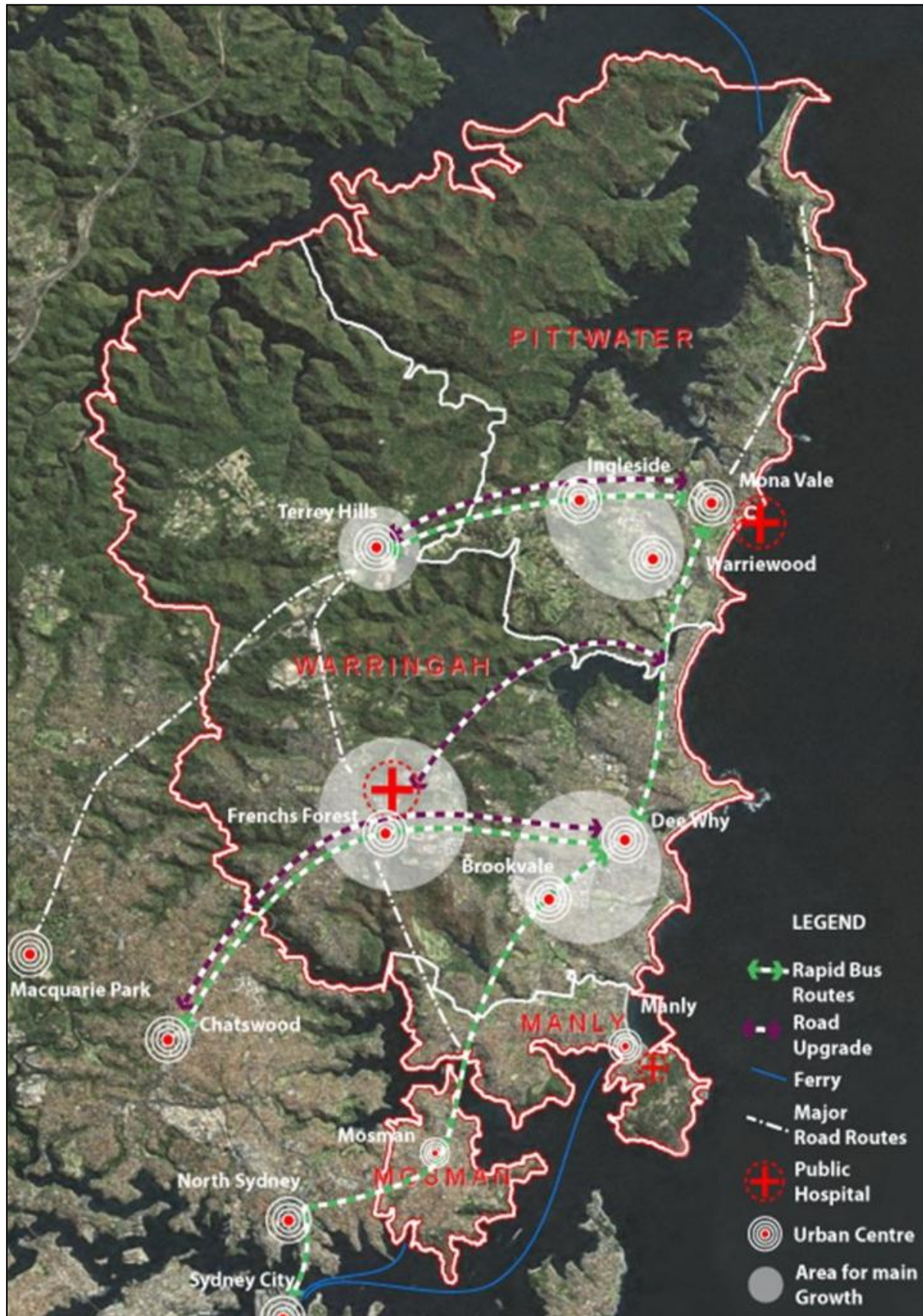
Central to the development and implementation of the Subregional Delivery Plans are the Subregional Boards proposed under the new Planning System. There is a need to ensure that these Boards provide a fair and equitable forum for each council to provide meaningful input into decision-making on behalf of their communities. It is also considered that the charters for these Subregional Boards should be developed and incorporated in the final Metropolitan Strategy.

SHOROC supports giving the Strategy statutory force and impose due responsibility on all agencies, not just local government, for its coordination and implementation. Accountability of preparation and delivery is needed on a state as well as a local level. This is vital to ensure that those priorities agreed by Cabinet in state, city-wide and regional plans are funded by Treasury and implemented by the agency responsible, as successful implementation of local plans rely on delivery of these priorities such as transport infrastructure, which have in the past been outlined in state planning documents but not delivered.

There is a need to ensure each action has clear accountabilities for delivery in terms of the agency responsible and clearly agreed timeframes and funding commitments. A detailed implementation plan should be 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.

Attachment 1: Major transport infrastructure priorities

Major infrastructure priorities and directions for housing & employment (*Shaping Our Future, 2010*)



2. The solutions in the short-term and medium-to-long-term

Manly, Mosman, Pittwater and Warringah councils (SHOROC) consider the integrated package of priority transport improvements for the short-term and the medium-to-long-term for the SHOROC region to be as follows:

Short-term (0-5 years) package of measures

- A fast Bus Rapid Transit system on the north-south corridor from Mona Vale to the CBD, via a median bus lane using tidal flow arrangements in peak hour. Establishing this BRT would incorporate Spit Bridge augmentation as recommended by Infrastructure NSW and the median bus lane may come into operation only south of Manly Vale or even the Spit where no further stops are required to minimise operational issues.
- Grade separation at the intersections of Warringah Road with Wakehurst Parkway and Forest Way and upgrades to Wakehurst Parkway to provide flood-free access, critical to the construction of the Northern Beaches Hospital at Frenchs Forest.
- Fast public transport links from Dee Why to Chatswood, with an initial focus on the provision of frequent and direct Express Bus services and bus priority measures as outlined in the BRT pre-feasibility report including works to address the capacity issues at the Forest Way/Warringah Rd intersection. These bus priority measures could potentially include a T3 lane rather than a 24hr bus lane on the road corridor to reduce the impact on car traffic.
- Construction of targeted park and rides to maximise patronage of public transport.
- Detailed regional transport planning in partnership with the councils to maximise the efficiency of the network and seek to manage demand and promote alternative transport.
- Implementation of the proposed bus network rationalisation including the new tiered network structure and associated frequency improvements. This new network structure should cover the entire region and integrate the bus network of the Warringah Rd and Mona Vale Road corridors with the Pittwater/Spit/Military Road corridor into a single public transport network.
- 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.

Medium-long term (5-20 years) package of measures

- Upgrading of the public transport links from Dee Why to Chatswood from Express Buses to a segregated BRT and potentially light rail or other greater capacity transport in future years as needed. It is noted that implementation of a median or kerbside BRT is proposed as the next stage in implementation of bus priority works on this corridor.
- The proposed Northern Beaches Link, from the Gore Hill Freeway to the Burnt Bridge Creek Deviation via a tunnel under Mosman and a new bridge over the Spit, combined with the BRT from the Northern Beaches to the CBD. This Link could be fast-tracked with private sector involvement and SHOROC welcomes the work of Infrastructure NSW in engaging with the private sector on the feasibility of its acceleration.
- A new underground Neutral Bay interchange for the Spit/Military Road BRT line to also serve buses from Sydney's North West, linking to a metro-style rapid transit service to Wynyard that travel across the Harbour Bridge and under Wynyard using the redundant tram tunnels.

Bus Rapid Transit as a regional public transport network

Planning for the Northern Beaches and Mosman should be on a region-wide basis and SHOROC considers the BRT delivered for this area should focus on an integrated network for the Pittwater/Spit/Military Road and Warringah Road corridors.

Its implementation should include bus network rationalisation as proposed in the BRT pre-feasibility report, the introduction of integrated ticketing, strong branding and promotion, an advanced fleet and stations.

A major public communications and education strategy will be critical to the community embracing it as a new public transport system rather than an incremental improvement, and to achieving the desired modal shift from private car travel.

The solution should also be one that delivers the optimal transport system for both public and private transport by focussing on a fast and reliable public transport system as well as targeted road upgrades.

A key objective should be a modal shift to public transport for both commuter travel and other trips, which would also ease traffic congestion for those that need to use their car for work or other purposes. The significant benefits of BRT are identified in the BRT pre-feasibility report which states that the potential passenger throughput with a BRT could be three to four times that for a lane used for general traffic, highlighting the positive impact on traffic congestion of a BRT.

Introduction of a BRT would also have a significant impact on the region's level of transport disadvantage. The Transport Master Plan indicates that significant areas in the Northern Beaches are beyond the recognised disadvantage thresholds of within 400 metres of a bus stop or 800 metres of ferry stops (see Figure 8.1). However it is recognised with the introduction of a BRT system the catchment areas are more in the order of 800 metres in line with those for rail and ferry travel because of the attractiveness of the fast, reliable and dedicated service.

Ferries and interchanges

SHOROC supports the franchising and rationalisation of the ferry network. For the SHOROC region this is potentially an opportunity to strengthen the role the ferry network plays in regional commuter and other travel.

It is considered that greater emphasis should be allocated on integrating the ferry network with other transport modes through fast and easy access from the bus network and BRT when it comes into operation as well as private car travel. There is particularly the need for adequate bus feeder services between Manly Wharf and the Northern Beaches and there is an unrecognised potential for services connecting Manly with the proposed new ferry hub at Barangaroo.

The issue of interchanges is significant and there is a need to recognise the importance and then fund construction of non-rail interchanges including those which service bus commuters (park and ride) and interchanges for bus and ferry services (especially at Manly). Interchanges should also be located and designed so that commuters can easily access them by bicycle or foot.

Local councils should be heavily involved in the planning of interchanges, particularly because of the resource implications for local councils in the development and maintenance of interchanges servicing regional and local centres.

SHOROC Submission

A New Planning System For NSW White Paper

June 2013

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7. Introduction & background

SHOROC is a partnership of Manly, Mosman, Pittwater and Warringah councils led by a Board of the council Mayors and General Managers. We collectively represent a population of 280,000 residents who contribute over \$20 billion annually to the NSW economy.

Our region covers an area of approximately 288km² in north east Sydney and is characterised by its outstanding natural environment and vibrant communities and as such regional and local planning are of major importance.

Local government will play a pivotal role in the future of greater Sydney. SHOROC welcomes the opportunity to provide a submission on the Planning Reform White Paper and its proposals for the future of planning in NSW.

***Shaping Our Future* – the regional strategy for transport, health, housing and jobs**

In 2010 the councils through SHOROC developed and all formally adopted *Shaping Our Future* to take the lead on integrated regional land use and infrastructure planning by bringing together major directions for housing, employment, transport and health.

Shaping Our Future links council planning for future housing and employment growth together with major infrastructure planning, focussing on hospital planning and the major transport infrastructure priorities for our region. It was developed through an evidence-based spatial analysis and planning process conducted by experienced council staff in partnership with expert planning consultants.

Shaping Our Future outlines a clear direction for the future of the Northern Beaches and Mosman based on significant analysis of regional constraints and opportunities as well as decades of on-the-ground experience and studies.

While it is understood the Subregional Delivery Plans outlined in the White Paper are envisaged to be more detailed than this strategy, *Shaping Our Future* forms a strong base on which to build and demonstrates the outcomes that can be achieved by councils collaborating through ROCs and working in partnership with the NSW Government on infrastructure planning and delivery.

This submission

The submission is structured to provide comments as follows:

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| 7. Introduction & background | Page 2 |
| 8. Major comments regarding the White Paper | Page 3 |
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| 3.1 Objectives & principles of the new planning system | Page 5 |
| 3.2 Community participation | Page 5 |
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| 10. Working in partnership to deliver the new planning system objectives | Page 10 |

2. Major comments regarding the White Paper

The current planning system has become complex and cumbersome and there is need for reform.

SHOROC is supportive of the focus on strategic planning at a regional and local level, the integration of infrastructure and land use planning, the proposed hierarchy of plans and the significant and meaningful community engagement. However some of the proposed changes are of concern and present significant risks which if unaddressed could have major negative implications for the future of NSW, its communities and environment.

Major comments regarding the *A New Planning System For NSW White Paper* are outlined below. Further detail is provided in the subsequent sections.

Objectives of the new planning system

SHOROC is supportive of the focus in the objectives on Sustainable Development. The concern however is that these objectives are not reflected strongly in the principles for strategic planning which will underpin the regional, subregional and local strategic planning process. While supportive of appropriate development and economic activity, it is considered there is currently an over emphasis on economic growth and productivity which could be used to drive development over environmental and social considerations.

Community participation and culture

SHOROC endorses the focus on public participation and engagement to meaningfully involve and empower communities in the planning system with a focus on the up-front strategic planning process.

However this new framework presents a major risk in that it is a significant challenge engaging the community and stakeholders at a strategic level meaningfully and on a representative basis, particularly at a subregional scale. A great example that emphasises this is that the difficulty meaningfully engaging the community in the development of the Metropolitan Strategy.

The move to this new framework will mean significant costs and resources for the state and councils which must be accounted for. It is critical that funding for councils and regional organisations is provided as an integral part of the package of reforms to facilitate effective up-front community engagement as part of the subregional and local planning process.

The flexibility of the form of community participation conducted by councils is welcomed. It is important the community is given certainty that the level of engagement will be proportional to the issue at hand, that is, extensive consultation must be conducted for major planning decisions whereas less or none is required on minor developments.

As recognised in the White Paper, there will be a need for a significant culture change within government and across the community with the introduction of the new planning system. SHOROC supports the NSW Government taking a leadership role to provide direction and supports to all aspects of the planning sector, in particular engaging the community in regard to how the new planning system will affect their lives.

Strategic planning framework & provision of infrastructure

SHOROC supports the proposed hierarchy of plans including the Metropolitan Plan, Subregional Plans and Local Plans and the proposal to integrate infrastructure and land use planning. SHOROC also generally supports the creation of Subregional Boards to for subregional planning and implementation.

It is critical the new framework means Subregional Delivery Plans truly **integrate, fund and phase** infrastructure construction by the NSW Government together with housing and employment delivery by councils to address the risk that development occurs without the necessary infrastructure as has occurred in the past.

The accountability for implementation needs to be binding for both state and local governments. It is critical that priorities agreed by Cabinet in state, city-wide and regional plans are funded by Treasury and implemented by the agency responsible. Successful implementation of local plans rely on delivery of these priorities such as transport infrastructure, which have in the past been outlined in state planning documents but not delivered.

The new planning system represents a rare opportunity to re-write the way in which state and local government can cooperate to deliver effectively for the community.

SHOROC welcomes a true partnership approach to the development and implementation of the Subregional Delivery Plans between state and local government. The SHOROC councils have worked with the NSW Government in this way in recent years, developing a high-level version of a subregional delivery plan *Shaping Our Future*, outlining directions for housing and employment growth and realistic infrastructure priorities, and then working in partnership with the NSW Government for implementation of this infrastructure.

Central to the development and implementation of the Subregional Delivery Plans are the Subregional Boards proposed under the new Planning System. There is a major risk that the difficulty with engaging the community on this subregional level and the limited council representation on the Subregional Boards could result in decisions at a subregional level which go against the interests of the community in any given LGA.

There is a need to ensure that these Boards provide a fair and equitable forum for each council to provide meaningful representative input into decision-making on behalf of their communities, particularly those that are most affected. Confidence that this is the case would be assured by including a robust process led by councils that ensures concurrence of all councils before finalisation of Subregional Delivery Plans. For example this process was followed by SHOROC where the high-level subregional plan *Shaping Our Future* was formally adopted by all four councils prior to adoption at a regional level.

Development assessment

SHOROC supports the need to progress development and streamline processes but this should not be at the expense of meaningful community involvement at this stage, the environment, or local character.

The proposed code assessment process creates significant concerns as a major risk for councils and government because the process goes too far by removing community consultation processes at development assessment level, as well as council's ability to offer a process to respond to community concerns regarding specific development in their area. Removing consultation completely at this stage is inconsistent with the centrepiece of the new planning system: the community participation charter.

The focus should be on streamlining processes including plan making, rezoning, and development assessment to provide certainty, clarity, and significant improvements in approval times but without removing community say completely for developments next door.

Options that should be considered include: incorporating local character provisions in the codes to ensure only development consistent with the local area is considered under this track; enabling flexibility for councils to facilitate a very short consultation period for code assessment, for example five days, to enable issues to be discussed and resolved without impacting on the overall time limit for Code Assessment; and/or ensuring complying and code-assessable development is only available for those types of development that are genuinely low impact.

The intent of creating fewer and broader land use zones is not supported as the current proposals will leave communities vulnerable to inappropriate development. The proposed residential zone in particular is too broad and should provide greater flexibility for individual residential and environmental zones to protect heritage and environmental characters. Low density, medium density and high density residential zones should not be collapsed into one broad residential zone as this will not encourage a diversity of housing stock and has the potential to result in reduced residential amenity. SHOROC submits that a test of character must be included as a statutory component of a Local Plan not contained in a development guideline

Ministerial powers

An issue that needs to be addressed is the broad powers of the Minister to amend strategic plans, codes and other planning instruments and remove council planning powers without community consultation or adherence to the community participation charter. While we understand the need for Ministerial capacity to step in to progress major developments and address significant issues, these should not be at odds with the strong focus of the new planning system on community participation and engagement.

3. Chapter by chapter comments on the proposed reforms

3.1 Objectives & principles of the new planning system

SHOROC is supportive of the focus on strategic planning at a regional and local level, the integration of infrastructure and land use planning, the proposed hierarchy of plans and the significant and meaningful community engagement.

SHOROC is supportive of the focus in the objectives on Sustainable Development, however it is critical that this does not weaken the overall focus of the planning system on sustainability and the principles of Ecologically Sustainable Development.

The concern however is that these objectives are not reflected strongly in the principles for strategic planning which will underpin the regional, subregional and local strategic planning process and focus on promoting the State's economy and productivity..."having regard to" environmental and social considerations. While supportive of appropriate development and economic activity, it is considered there is currently an over emphasis on economic growth and productivity which could be used to drive development over environmental and social considerations.

3.2 Community participation

SHOROC endorses the focus on public participation and engagement to meaningfully involve and empower communities in the planning system with a focus on the up-front strategic planning process.

However this new framework presents a major risk in that it is a significant challenge engaging the community and stakeholders at a strategic level meaningfully and on a representative basis, particularly at a subregional scale. A great example that emphasises this is the community has not meaningfully engaged in the development of the Metropolitan Strategy.

Specific comments in regard to the elements of the community and stakeholder engagement proposals are as follows:

- **The Community Participation Charter and key legislation requirements**

The Community Participation Charter is supported and the need for a framework that benchmarks minimums and encourages best practice and innovation is endorsed.

The Charter should be based on the IAP2 Public Participation Spectrum to make it clear the level of engagement that is expected for various elements of engagement.

While the flexibility for councils in determining appropriate consultation is welcomed, simply setting minimum exhibition periods as the requirements is not sufficient and leads to a risk that meaningful consultation will not be undertaken.

It is important the community is given certainty that the level of engagement will be proportional to the issue at hand, that is, extensive consultation must be conducted for major planning decisions whereas over-consultation on minor developments should be avoided.

- **Early Community Involvement**

As outlined above, SHOROC endorses the meaningful engagement of communities up-front in the strategic planning process. However this new framework presents a major risk in that it is a significant challenge engaging the community and stakeholders at a strategic level meaningfully and on a representative basis, particularly at a subregional scale. Experience to date suggests the community does not engage meaningfully in strategic planning but does engage in local development decisions.

The move to this new framework will mean significant costs and resources for the state and councils which must be accounted for. It is critical that funding for councils and regional organisations is provided as an integral part of the package of reforms to facilitate effective up-front community engagement as part of the subregional and local planning process.

As recognised in the White Paper there will be a need for a significant culture change within government and across the community with the introduction of the new planning system. As the proposed system relies on consultation at the strategic planning stage rather than at the application

stage (for complying and code assessable), there will be a major need to unwind the expectations of the community about their ability to be consulted.

SHOROC supports the NSW Government taking a leadership role to provide direction and support to all aspects of the planning sector, in particular engaging the community on how the new planning system will affect their lives. There needs to be a significant community information campaign led by the NSW Government to explain the change in the system, people's rights and opportunities for involvement, and to encourage participation in the strategic planning process.

3.3 Strategic planning framework

Strategic planning principles

The proposed strategic planning principles are largely supported by SHOROC. The integration of infrastructure, provision of early opportunities for community participation, constructive cooperation, evidence base and regular monitoring and reporting of outcomes are commended.

There is a need to revisit the overarching principle focussed on strategic planning outcomes to ensure it adequately reflects the objectives of the Act and their focus on sustainable development. While supportive of appropriate development and economic activity, it is considered there is currently an over emphasis on economic growth and productivity which could be used to drive development over environmental and social considerations.

Hierarchy of plans, regional, subregional and local planning

SHOROC supports the proposed hierarchy of plans including the Metropolitan Plan, Subregional Plans and Local Plans, the proposal to integrate infrastructure and land use planning, and generally supports the creation of Subregional Boards to oversee subregional planning and implementation.

This proposal for Regional, Subregional and Local Plans to be established as statutory documents is fully supported. Desired character statements must be afforded a high level of statutory power than currently is proposed in the White Paper.

As the Regional Growth Plan for Greater Sydney, the Metropolitan Strategy should be truly a whole-of-government plan, properly integrating and detailing major infrastructure which is fully funded to provide certainty for the community and planners.

The development of Subregional Delivery Plans is supported. This will enable appropriate evidence-based regional targets to be set based on major infrastructure provision and then local planning to determine target delivery through negotiation between the councils, monitored by the Board and implemented through the Local Plans.

To enable meaningful community participation at this level, it will be important that the NSW Government clearly communicates that the Metropolitan Strategy sets the overarching 'minimum' targets and growth strategies for each subregion. This will make it clear that the Subregional Delivery Plan consultation is focussed on delivering these targets, that is, the Plans have set parameters to be implemented and are not blank slates for broad community discussion.

It is critical the new framework means Subregional Delivery Plans truly **integrate, fund and phase** infrastructure construction by the NSW Government together with housing and employment delivery by councils to address the risk that development occurs without the necessary infrastructure as has occurred in the past.

For example a Subregional Delivery Plan may include council zoning land parcels for increased housing density in stages over time, with progression to the next stage subject to delivery by the NSW Government of a planned road or public transport upgrade.

The accountability for implementation needs to be binding for both state and local governments. It will be critical that priorities agreed by Cabinet in state, city-wide and regional plans are funded by Treasury and implemented by the agency responsible. Successful implementation of local plans rely on delivery of these

priorities such as transport infrastructure, which have in the past been outlined in state planning documents but not delivered.

The development of Subregional plans requires a clear and realistic timeframe that covers resourcing and meaningful consultation. There is a need to recognise and respond to the fact that development of Subregional plans, local plans and coordination of and participation in the Regional Boards will have significant resourcing implications for councils and regional organisations.

It is also considered that the Minister's powers are too far reaching and inconsistent with the objectives of the Community Participation Charter in regard to the capacity to amend or replace any provisions of a Subregional or Local Plan. This should not be possible without concurrence of council or via a robust community consultation process consistent with the charter.

Coordination of Subregional planning and the Subregional Boards

The new planning system represents a rare opportunity to re-write the way in which state and local government can cooperate to deliver effectively for the community.

SHOROC welcomes a true partnership approach to the development and implementation of the Subregional Delivery Plans between state and local government.

The councils of the SHOROC region have worked well in partnership with the NSW Government on Subregional planning in recent years. The councils collaborated through SHOROC to develop a high-level version of a subregional delivery plan *Shaping Our Future*, outlining directions for housing and employment growth and realistic infrastructure priorities, and then worked in partnership with the local NSW MPs and the NSW Government for implementation of this infrastructure.

Central to the development and implementation of the Subregional Delivery Plans are the Subregional Boards proposed under the new Planning System. SHOROC supports flexibility for councils to determine appropriate representative for Subregional Board and consider on balance that elected representatives are preferable as these bodies will be determining the regional and local strategic direction and their inclusion aligns with the proposal to strengthen strategic planning and depoliticise development decisions.

There is a major risk that the difficulty with engaging the community on this subregional level and the limited or disproportionate council representation on the Subregional Boards could result in decisions at a Subregional level which go against the interests of the community in any given LGA.

There is a need to ensure that these Boards provide a fair and equitable forum for each council to provide meaningful representative input into decision-making on behalf of their communities, particularly those that are most affected. The new planning system must include a robust process led by councils that ensures concurrence of all councils before finalisation of Subregional Delivery Plans, such as was followed by SHOROC where the high-level subregional plan *Shaping Our Future* was adopted by all four councils prior to adoption at a regional level.

NSW planning policies

The development of NSW planning policies is supported in principle however the development process must involve meaningful community engagement consistent with the Community participation Charter to ensure community confidence in the system, councils and the NSW Government. The timeframe outlined in the White Paper suggests that there will not be sufficient opportunity for meaningful community consultation.

Fewer and broader landuse zones

The intent of creating fewer and broader land use zones is not supported as the current proposals will leave communities vulnerable to inappropriate development. The proposed residential zone in particular is too broad and should provide greater flexibility for individual residential and environmental zones to protect heritage and environmental characters. Low density, medium density and high density residential zones should not be collapsed into one broad residential zone as this will not encourage a diversity of housing stock and has the potential to result in reduced residential amenity.

SHOROC submits that a test of character must be included as a statutory component of a Local Plan not contained in a development guideline.

Should the government proceed with this proposal then there should be meaningful community engagement consistent with the Community participation Charter.

3.4 Development Assessment

SHOROC supports the need to reform the current development assessment process. However there are significant risks with the proposals and inconsistencies between the focus on meaningful community engagement and the proposed reforms.

Specific comments in regard to the elements of the development assessment proposals are as follows:

One assessment system with different tracks

SHOROC supports the need to progress development and streamline processes but this should not be at the expense of meaningful community involvement at this stage, the environment, or local character.

The proposed code assessment process creates significant concerns as a major risk for councils and government because the process goes too far by removing community consultation processes at development assessment level, as well as councils' ability to offer a process to respond to community concerns regarding specific development in their area.

Removing consultation completely at this stage is inconsistent with the centrepiece of the new planning system: the Community Participation Charter.

The proposed code assessment process also presents a risk for local character and the environment if councils are unable to adequately account for major local issues in the codes. It will be critical that councils are able to account for issues such as views, shadowing and heritage.

The target for 80% of development to be complying and code assessable is a concern and cannot be applied in a one-size fits-all approach all over Sydney. This is particularly evident in areas where the community has a propensity to deliberately choose 'bespoke' development and to undergo a merit assessment to demonstrate that their development is unique.

The focus should be on streamlining processes including plan making, rezoning, and development assessment to provide certainty, clarity, and significant improvements in approval times but without removing community say completely for developments next door.

Options that should be considered include:

- Incorporating local character provisions in the Codes to ensure only development consistent with the local area is considered under this track.
- Enabling flexibility for councils to facilitate a very short consultation period for code assessment, for example five days, to enable issues to be discussed and resolved without impacting on the overall time limit for code assessment (this option is not supported by Warringah Council).
- Ensuring complying and code-assessable development is only available for those types of development that are genuinely low impact.
- Promoting discussion between proponents and neighbouring properties before commencing the development assessment process to address issues up front.

The proposed exempt and complying assessment and merit assessment track processes are largely supported, however the proposal to allow variations to complying development is not supported. This proposed change has not been well considered by the Department and would have the potential to erode strategic planning work that involved the community and remove certainty and transparency in the system.

In addition while councils are fully supportive of seeking a faster process, as the community is not aware of the process for exempt and complying development currently, the system will require a significant education campaign to avoid misunderstanding and acrimony.

Determination by independent experts

As outlined in our previous submissions, SHOROC supports continued efforts to depoliticise all levels of decision-making on developments by no longer having politicians involved in decision-making for DAs, and to expand the role of the planner and independent panels in assessing and determining development applications. We stress the importance of development assessments being made by experienced professionals, being both impartial and accountable.

The role of IHAPs and JRPPs is generally supported, but any duplication of responsibilities as currently appears to occur should be removed.

Strategic compliance

SHOROC endorses whole-of-government strategic planning and genuine community participation.

However the strategic compatibility certificate process is not supported as it has the potential to circumvent due process and undermine community buy-in and engagement with the strategic regional and local planning process.

While we understand this process may be intended as an interim solution for the gap between when the subregional plan is developed and the local plan finalised, it creates a significant risk for potential abuse or misuse of the system and a perception that it is Part 3A reincarnated.

As such, if this is to be allowed, it needs to be done through a proper, accountable, transparent process with appropriate community engagement and only granted with the concurrence of council.

State significant development

The proposed state significant development process is generally supported including the independent environmental impact statement process and the development of an accredited panel required to meet certain standards regarding the impartiality and quality of their work. Local councils and communities should be involved in the EIS process so that appropriate engagement is conducted at all levels as the EIS is prepared.

3.5 Provision of infrastructure

SHOROC strongly supports the proposed integration of infrastructure and land use planning.

It is critical the new framework means Subregional Delivery Plans truly **integrate, fund and phase** infrastructure construction by the NSW Government together with housing and employment delivery by councils to address the risk that development occurs without the necessary infrastructure as has occurred in the past.

For example a Subregional Delivery Plan may include council zoning land parcels for increased housing density in stages over time, with progression to the next stage subject to delivery by the NSW Government of a planned road or public transport upgrade.

The accountability for implementation needs to be binding for both state and local governments. It will be critical that priorities agreed by Cabinet in state, city-wide and regional plans are funded by Treasury and implemented by the agency responsible, as successful implementation of local plans rely on delivery of these priorities such as transport infrastructure, which have in the past been outlined in state planning documents but not delivered.

The establishment of local infrastructure contributions in Local Plans and removal of the contributions cap is supported. However three years is not a sufficient time period for expending local or regional infrastructure contributions as it is not always feasible for major infrastructure work and development doesn't always happen in this time period. As such, there is a need for the contributions plan timeline to be extended or more flexible for major infrastructure.

SHOROC supports the proposal for regional infrastructure contributions, however the Bill should extend these to subregional contributions as it is at this level that the subregional Board should be able to establish the major infrastructure needs for a region in the metropolitan area, not just the growth plan (Metropolitan Strategy).

It is also important that the new infrastructure plans focus on existing urban areas as part of urban consolidation and do not exclude these areas from infrastructure provision.

Existing areas such as the SHOROC region encompassing the Northern Beaches and Mosman critically require transport and health infrastructure upgrades to cope with current issues before any thought is even given to growth targets.

Ongoing analysis of the cumulative impacts of urban consolidation on existing infrastructure, including schools, childcare centres, aged care facilities, roads and transport systems is required, and should be addressed when preparing Subregional Delivery Plans and Growth Infrastructure Plans.

3.6 Building regulation and certification

In regard to building regulation it is important to strengthen the regulation of private certifiers through an accreditation body that administers the compliance of certifiers. This is important to ensure they comply with the requirements of any code development process and also take responsibility for any compliance or remedying issues that may arise.

The plans outlined in the White Paper to strengthen controls on certifiers through stronger disciplinary guidelines, increased auditing and increased obligations to report non compliant building work are supported. There is a lack of confidence in the current planning system relating to private certifiers. The process of dealing with complaints and unauthorised works is time consuming with many reports of people contacting the certifier and the certifier not getting back to them or the Building Professionals Board taking a long time to resolve a complaint. The complaints process should be made easier and the Building Professionals Board should be given more resources and stronger controls to ensure that complaints are dealt with efficiently

4. Working in partnership to deliver the new planning system objectives

SHOROC supports a clear link and integration between the Metropolitan Strategy and other policies such as the Long Term Transport Masterplan, State Infrastructure Plan and NSW2021 Regional Action Plans.

The new planning system represents a rare opportunity to re-write the way in which state and local government can cooperate to deliver effectively for the community.

SHOROC would welcome a true partnership approach to development and implementation of the Subregional Delivery Plans between state and local government.

The councils of the SHOROC region have worked well in partnership with the NSW Government on Subregional planning in recent years. The councils collaborated through SHOROC to develop a high-level version of a subregional delivery plan *Shaping Our Future*, outlining directions for housing and employment growth and realistic infrastructure priorities, and then worked in partnership with the local NSW MPs and the NSW Government for implementation of this infrastructure.

Central to the development and implementation of the Subregional Delivery Plans are the Subregional Boards proposed under the new Planning System. There is a need to ensure these Boards provide a fair and equitable forum for each council to provide meaningful representative input into decision-making on behalf of their communities. It is also considered the charters for these Subregional Boards should be developed and incorporated in the final Metropolitan Strategy.

SHOROC supports giving Regional, Subregional and Local Plans statutory force and imposing due responsibility on all agencies, not just local government, for coordination and implementation. Accountability of preparation and delivery is needed on a state as well as a local level. This is vital to ensure the priorities agreed by Cabinet in state, city-wide and regional plans are funded by Treasury and implemented by the agency responsible, as successful implementation of local plans rely on delivery of these priorities such as transport infrastructure, which have in the past been outlined in state planning documents but not delivered.

An issue that needs to be addressed is the broad powers of the Minister to amend strategic plans, codes and other planning instruments without community consultation or adherence to the Community Participation Charter. While we understand the need for Ministerial capacity to step in to progress major developments and to address significant issues, these should not be at odds with the strong focus of the new planning system on community participation and engagement. There needs to be a provision in the Planning Bill so the Minister cannot amend strategic plans without further community consultation, consistent with the scale of the decision being made, before a decision is made.

A clear and transparent process is also required with appropriate checks and balances such as performance benchmarks for councils based on clear criteria and procedure with independent (non-political) advice before the Minister is able to step in and remove council planning powers.

Proposed new subregional groupings and review of ROCs

The subregional groupings proposed in the Draft Metropolitan Strategy are a fundamental element of the implementation of the new proposed planning system. As such comments regarding the proposed subregions are below.

SHOROC reviewed the proposed subregions in the draft Metropolitan Strategy to identify how the objectives of the Strategy and the new Planning System can best be achieved. It is considered the primary criteria for the subregional groupings are the most effective groupings to:

- accommodate/manage growth
- streamline and integrate service delivery between councils and the NSW Government
- integrate planning and provision of infrastructure, particularly transport
- enable effective and meaningful community consultation and engagement
- facilitate the optimal governance arrangement to address the relevant community of interest.

Due regard must also be given also to the local government reform program and the inter-dependence of councils within the potential subregions.

Based on these criteria SHOROC:

- Supports the new proposed Northern Sydney Subregion outlined in the draft Metropolitan Strategy which includes Manly, Warringah, Pittwater, Ku-ring-gai and Hornsby councils.
- Strongly opposes the proposed Central Subregion as there is no clear community of interest or links between the communities concerned, critical to effective community engagement in subregional planning. It does not align with NSW Government planning regions for health, education or NSW2021 and it will not facilitate more effective infrastructure planning.
- Argues that a new 'Inner-North' Subregion should be established which includes Mosman, North Sydney, Ryde, Willoughby, Lane Cove and Hunters Hill councils.

The proposed "Central" Subregion is inappropriate, unworkable and not supported due to the following factors:

- There is insufficient justification that the harbour and focus on economic activity in the subregion override the difficulties in appropriately planning for such a diverse region accommodating such a large population.
- Community consultation would be very difficult on this scale as the population is too big for meaningful consultation, going against the community participation focus in the proposed new

planning legislation. Communities don't see themselves as part of the proposed region and as such will not be able to meaningfully participate in subregional planning.

- It will not be practical and feasible to effectively manage consultation/meetings across 17 councils and state agencies and make appropriate decisions having regard to the views of communities and the best outcomes for the subregion.
- The inclusion of the majority of economic activity within this subregion goes against the centres-based policy and promotion of decentralised employment of the Strategy by relegating the other subregions to 'feeder' regions for this central grouping.
- Difficulty of effectively planning transport and land use for northern Sydney as a whole as the Central Subregional grouping will likely have little regard to the directions of the North Subregion and its priorities in connecting with Global Sydney and the Global Economic Corridor.

SHOROC considers a significantly more effective arrangement is to establish a new 'Inner-North' Subregion which includes Mosman, North Sydney, Ryde, Willoughby, Lane Cove and Hunters Hill councils. Key reasons are:

- Creates considerably better opportunity for stronger integration of land use and transport planning, a key priority of the Metropolitan Strategy, and greater flexibility to plan employment and housing growth along priority transport corridors and major centres across northern Sydney to improve containment.
- Would enable the Inner-north and North Subregions to collaborate to integrate planning land-use, transport, health, education and other services on a broader scale, which would be very difficult if the inner-north councils were included in the Central Subregion. The potential creation of a ROC covering both these subregions would also enable this ROC to facilitate this coordination process.
- Capacity for much stronger integration with other NSW Government service delivery and infrastructure planning, including alignment with NSW Health, NSW Education, and NSW2021 Regional Action Plan boundaries.
- Clear connections and communities of interest, making consultation more feasible. The North Shore and Northern Beaches, while distinct communities (and sub-communities) are strongly connected in regard to employment, housing, sport, recreation, education, health, and other aspects of people's daily lives. This significantly increases the likelihood of meaningful engagement for the significant consultation planned on a subregional level.
- Good existing working relationships between the councils and bodies such as SHOROC and NSROC to facilitate collaboration and coordinate subregional planning. Also more adaptable to any potential future changes in the form of local government.

Councils are also currently exploring opportunities to merge SHOROC and NSROC or to transition to an alternative grouping of northern Sydney councils due to the improved integrated planning, joint services and purchasing outcomes that could be achieved. The proposed subregions above would enable the councils to collaborate to effectively facilitate the coordination and integration of transport and land use planning for northern Sydney.