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28 June 2013

The Hon Brad Hazzard MP
Minister for Planning and Infrastructure
c/o New Planning System
GPO Box 39, Sydney NSW 2001

Dear Minister Hazzard

Submission on the *A New Planning System For NSW White 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 the four SHOROC councils to provide input to the development of the proposed new planning system for NSW in response to the *A New Planning System For NSW White Paper*.

Please find attached a copy of SHOROC's submission.

We would welcome further discussions with you 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



SHOROC Submission

A New Planning System For NSW White Paper

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 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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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.