



28 June 2013

Draft Metropolitan Strategy for Sydney
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Strategy Team,

Re: Submission: Draft Metropolitan Strategy for Sydney to 2031

I am writing in response to the Department's call for submissions on the *Draft Metropolitan Strategy for Sydney to 2031*.

Mosman is a small local government area with a track record of taking the initiative in implementing planning reform. Our management of heritage, protection of the significant harbour foreshores, high quality, architect designed housing and recent adoption of a standard instrument local environmental plan are indicative of our commitment to current planning practice and delivering good planning outcomes. Local government is a key stakeholder in strategic planning, development assessment, infrastructure planning and delivery, and planning and managing our heritage, built and natural environments. Mosman is an established, sought after suburban area close to the city. It has a range of housing choices and over 60% of its housing stock is multi unit dwellings making it a leading example of what can be achieved with infill development while still maintaining the significance of environmentally sensitive slopes on the harbour.

Council's main concern with the draft Metropolitan Strategy is the proposed Central Subregion. An alternative subregion will be proposed in this submission.

The link between the subregions determined in the Metropolitan Strategy and the planning system reforms outlined in the White Paper is significant and has been downplayed in the current public consultation by the State. The implications for the content of the Subregional Delivery Plans and the ultimate content for Local Plans as outlined in the White Paper are dependant upon having subregions that serve a community of interest. Council is strongly opposed to being included in the Central Subregion for the following reasons:

- There is not sufficient 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 (1.144 million), going against the Community Participation focus in the proposed new Planning legislation. Communities just 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, plus 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 landuse 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.

Consistent with the views of SHOROC, in which Mosman is a member council, it is considered that the Subregions should be established that can most effectively meet the following criteria:

- Accommodate and 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; and
- facilitate the optimal governance arrangement to address the relevant community of interest.

Based on these criteria Council:

- 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.

Council 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:

- It would create a 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.
- It 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.
- It would increase 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.

- It would provide 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 increases significantly the likelihood of meaningful engagement for the significant consultation planned on a Sub-regional level.
- It would utilise good existing working relationships between the councils and bodies such as SHOROC and NSROC to facilitate collaboration and coordinate sub-regional planning. Also more adaptable to any potential future changes in the form of local government.

The White Paper for a New Planning System for NSW identifies the Metropolitan Strategy as a Regional Growth Plan under the hierarchy of plans. All plans prepared by State and local authorities will be required to adhere to objectives in the Community Participation Charter and prepare a Community Participation Plan in consultation with their communities. As this has not yet been done by the Department it is considered that the draft Strategy should be deferred until such time as it can be consulted with the community consistent with a Community Participation Plan. In this way the Department can show leadership and deliver a Strategy by a transparent process. If this is not done then the new planning system is already compromised.

In conclusion, I would reiterate in the strongest possible terms that Mosman objects to the make up of the Central Subregion, and for the reasons outlined above recommends being included in a subregion with councils on the northern side of the harbour in order to better meet metropolitan and local planning objectives.

Thank you for the opportunity to comment on the Draft Strategy. If you have any questions regarding this submission please contact Linda Kelly on 9978 4041.

Yours faithfully,

V H R MAY
GENERAL MANAGER



Per:

(Linda Kelly, Manager Urban Planning)