

DRAFT

Greater Sydney Commission
PO Box 257
NORTH PARRAMATTA NSW 2124

Dear Commission;

Re: Draft Greater Sydney Region Plan and revised draft North District Plan

I am writing in response to public exhibition of the Greater Sydney Commission's draft *Greater Sydney Region Plan* and revised draft *North District Plan* during October -December 2017.

Mosman is well-placed to provide comment on the draft plans, being one of the local government areas within the North District, and having been involved in discussions with the Commission and other North District councils over the past few years regarding planning for the district's forecast population growth and change.

The draft plans were the subject of a report to Council on 5 December 2017, where it was resolved that this submission be endorsed and forwarded to the Commission.

Infrastructure

Revised draft North District Plan Planning Priority:

N1: Planning for a city supported by infrastructure

Draft Greater Sydney Region Plan Objectives:

Objective 1: Infrastructure supports the three cities;

Objective 2: Infrastructure aligns with forecast growth – growth infrastructure compact;

Objective 3: Infrastructure adapts to meet future needs;

Objective 4: Infrastructure use is optimized

Comment:

A focus of the draft plans is to integrate land use and public transport to enable people to have 30-minute public transport access to one of three cities and to services in their nearest strategic centre, seven days a week. Committed transport initiatives (of NSW Transport's related draft plans) affecting Mosman include the B-Line bus rapid transit corridor along Spit/Military Roads, and Western Harbour Tunnel and Beaches Link (subject to a final business case) which although outside the boundaries of Mosman would direct considerable road traffic away from Spit/Military Roads. A submission to NSW Transport regarding the draft *Future Transport 2056 Strategy* and draft *Greater Sydney Services and Infrastructure Plan* is attached for your information.

Housing

Revised draft North District Plan Planning Priority:

N5: Providing housing supply, choice and affordability with access to jobs and services

Draft Greater Sydney Region Plan Objectives:

Objective 10: Greater housing supply;

Objective 11: Housing is more diverse and affordable

Comment:

Mosman's five-year (2016-2021) housing supply target is 300 dwellings. Research into capacity within the business zones and the medium density residential zone within Mosman for additional housing has confirmed that there is sufficient capacity under Mosman Local Environmental Plan 2012 for the Commission's proposed five-year housing target for Mosman to be met. Council notes that the Commission will work with Council to develop 6-10-year housing targets.

However, Council raises concerns regarding the current level of traffic congestion within Mosman, and the impact that increased housing supply in Mosman (and neighbouring areas) will have on the road network. This concern was raised in Council's submission to the Commission on the earlier exhibited draft plans dated 30 March 2017.

Further, there is evident conflict between what the Commission is trying to achieve, and the NSW planning system, in regards to an overreliance on planning proposals to address planning issues and affect change. Local housing strategies and LEP amendments – prepared by councils based on sound strategic planning in response to obligations under the Commission's district plans - may be overridden by a proponent-initiated planning proposal seeking to further change the zoning and controls applicable to land beyond that identified in strategic planning for an area. The cumulative impact of such ad hoc changes can be detrimental, and is contrary to good planning practice.

The Affordable Rental Housing Target (5-10 per cent of new residential floor space, set aside for very low to low-income households) is a good initiative however this may only have a limited impact on the size of the affordable rental housing sector. This is an issue for a whole of government approach rather than considering the issue as a planning problem that would be rectified by increased housing supply.

Centres

Revised draft North District Plan Planning Priority:

N6: Creating and renewing great places and local centres, and respecting the District's heritage

Draft Greater Sydney Region Plan Objectives:

Objective 12: Great places that bring people together;

Objective 13: Environmental heritage is conserved and enhanced

Comment:

It is noted that the Commission has revised its hierarchy of centres, and now identifies only three –metropolitan city centres; strategic centres; and local centres – with only one, Spit Junction local centre, identified within Mosman. It is further noted that these centres, particularly those subject to investment in transport, are a focus for growth and change. Spit Junction has long been a focus of Mosman's residential development strategy for housing supply given its location on the ridgeline along Spit/Military Roads and within the State's strategic bus corridor. Comments relating to housing capacity and traffic congestion above apply to planning within Spit Junction

Environment/Sustainability

Revised draft North District Plan Planning Priority:

N15: Protecting and improving the health and enjoyment of Sydney Harbour, and the District's waterways

N16: Protecting and enhancing bushland and biodiversity

N17: Protecting and enhancing scenic and cultural landscapes

N19: Increasing urban tree canopy cover and delivering Green Grid connections

Draft Greater Sydney Region Plan Objectives:

Objective 25: The coast and waterways are protected and healthier

Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced

Objective 28: Scenic and cultural landscapes are protected
Objective 30: Urban tree canopy cover is increased;
Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths

Comment:

The importance of improving sustainability within Greater Sydney, and the Commission's objectives - such as to protect and manage bushland, waterways and other natural systems; to increase tree canopy coverage to cool the urban environment; to deliver 'green grid' connections; to promote efficient use and re-use of energy, water and waste; and to build resilience – are echoed in Council's existing plans and policies.

The Commission's recognition of the importance of Sydney Harbour, and protecting and enhancing scenic and cultural landscapes, is also supported. I note in the revised draft North District Plan, that you write in relation to Sydney Harbour that it is one of Sydney Harbour's most valuable assets and "*it is part of what makes Sydney one of the most attractive and recognisable cities in the world.*" As you are aware, Council has had for many decades, and continues to have, a Scenic Protection Area covering the valued, tree-lined harbor foreshore slopes to Sydney and Middle Harbours, and applies a fine-grained assessment of planning controls to any proposed development on such land.

However, there is evident conflict between what the Commission is trying to achieve and some State policies. For example, some current policy direction of the NSW Department of Environment and Planning, such as extending complying development types, have the potential to undermine the Commission's priorities such as the green grid and extending the urban tree canopy, and protecting and enhancing scenic and cultural landscapes.

Your recognition of the importance of Sydney Harbour (N15) and scenic and cultural landscapes (N17) provides statutory weight to the importance of areas like the Mosman Scenic Protection Area and will play a significant role in our continuing efforts to permanently protect this area from inappropriate development.

Thank you for the opportunity to consider the draft plans and provide feedback. I look forward to continuing to work with the Commission on planning for the District. Please contact Kelly Lynch, Senior Strategic Planner, on 9978 4058 or k.lynch@mosman.nsw.gov.au should you require further information.

Yours sincerely

Craig Covich
DIRECTOR ENVIRONMENT AND PLANNING

DRAFT

NSW Transport
PO Box K659
HAYMARKET NSW 1240

Dear NSW Transport;

Re: Draft Future Transport 2056 Strategy and draft Greater Sydney Services and Infrastructure Plan

I am writing in response to public exhibition of NSW Transport's draft *Future Transport 2056 Strategy* and draft *Greater Sydney Services and Infrastructure Plan* during October -December 2017.

Mosman is well-placed to provide comment on the draft plans, being one of the local government areas within the North District of Greater Sydney, 8 kilometres north-east of the Sydney CBD, and home to a population of around 30,000 people in addition to popular business and tourism attractors (i.e. Taronga Zoo, Balmoral Beach). Mosman is the location of one of Sydney's most congested arterial thoroughfares – Spit and Military Roads – providing access from the Northern Beaches through to the Sydney CBD, in addition to NSW bus and ferry services.

The draft plans were the subject of a report to Council on 5 December 2017, where it was resolved that this submission be endorsed and forwarded to NSW Transport.

Generally, the approach and assumptions in the draft plans appear sound, and a long-term approach to transport is welcomed after an acknowledged failure to adequately plan and execute in recent decades. However, there is little discussion within the Strategy about joining up Federal, State and local government planning.

Comment on the specific outcomes of the draft plans is provided below.

Connections to centres

Draft plan outcome:

Successful places: People enjoy 'living local' with fast connections to strong centres that drive economic growth and social cohesion

A growing economy: A powerhouse economy, enabled by efficient links between people, places, businesses and markets

Comment:

A focus of the draft plans is to integrate land use and public transport to enable people to have 30-minute public transport access to one of three cities and to services in their nearest strategic centre, seven days a week. Committed transport initiatives affecting Mosman include the B-Line bus rapid transit corridor along Spit/Military Roads, and Western Harbour Tunnel and Beaches Link (subject to a final business case) which although outside the boundaries of Mosman would direct considerable road traffic away from Spit/Military Roads.

The broad concept of a road tunnel to connect the Northern Beaches to the rest of Sydney is supported by Council (Council Meeting 7 February 2017, EP/4) in so far that it may diminish the vehicular congestion and through-traffic impacts currently experienced by Mosman residents, although possible environmental impacts are of concern. Without it, there is little in the *Draft Future Transport 2056 Strategy* that suggests any marked transport improvement in the Mosman area unless there are sizeable reductions in the number of vehicles using Spit and Military Roads through an increase in shared transport, which at present appears unlikely.

Customer focus

Draft plan outcome:

A customer focus: Every customer experience will be seamless, interactive and personalised by technology and big data

Comment:

The draft plans forecast the rise of electric vehicles, both human driven and autonomous. One issue that Council currently faces is that some residents are beginning to request that Council provides charging stations for electric vehicles. Council, after considering the matter, believes that local government's role is to help facilitate spaces for charging infrastructure, but not to provide and maintain charging infrastructure. This is because:

1. To be most effective as a wider system, charging infrastructure needs to be standardised across the state and the nation. It should fall to the state government, and perhaps the federal government, to set standards for charging infrastructure.
2. It is unlikely that local governments will have the expertise to maintain and operate charging infrastructure. Economies of scale would suggest that utility or companies working at a state or national level would be the entities to provide, maintain and operate charging infrastructure.
3. Mosman sees the provision of such infrastructure as a role for private enterprise rather than a government service (consistent with what is written in the Strategy).

Council recommends that the State more thoroughly considers its role in the standardisation and regulation of charging infrastructure and integrates a firm position into its strategy in order to give direction in this rapidly emerging area. This should be a priority for the State.

Technology should be used to optimise transport services, however the State should consider and plan for a high level of cyber security, system redundancy and back-up measures for any technological outages. Council welcomes the approach to open data sharing to foster innovation and improved services.

Safety, performance and accessibility

Draft plan outcome:

Safety and performance: Every customer will travel safely across a high performing network
Accessible services: Seamless mobility will enable the participation for all members of the community

Comment:

The draft plans discuss safety mainly in the context of design. Mosman Council believes that more of an emphasis needs to be placed on maintenance and renewal, though it acknowledges that the draft plans do discuss, to some, extent maintenance.

With an ageing population in Mosman, and to provide for services for people with a disability, this outcome is supported.

Financial and environmental sustainability

Draft plan outcome:

Financial and environmental sustainability: A transport system that contributes to a strong economy and environmental and community wellbeing

Comment:

The draft plans acknowledge that population density affects the financial sustainability of the provision of transport services. It also advocates physically separate bicycle paths. The strategy should more deeply consider the challenge of land availability and use, and more explicitly detail the State's desired approach to dealing with these issues. If greater density is desired, how will transport systems cope with this when they are already suffering high congestion under current densities? Where will bicycle paths be built, when the draft plans acknowledge that transport corridors may not change significantly?

While the plans suggest that the State's role will move more to regulation than a service provider itself, Council notes that it is unlikely that the State, or state-owned corporations, will cease to be the providers of the road or rail networks. As the draft plans state, the road network is the largest asset the State owns, and for the State to see its role in respect to it changing is cause for some concern. The same applies to rail infrastructure.

Thank you for the opportunity to consider the draft plans and provide feedback. I look forward to continuing to work with the Commission on planning for the District. Please contact Patrick Lavery, Special Projects Engineer, on 9978 4270 or p.lavery@mosman.nsw.gov.au should you require further information.

Yours sincerely

Craig Covich
DIRECTOR ENVIRONMENT AND PLANNING