

30 March 2017

Greater Sydney Commission
Draft North District Plan
PO Box 257
Parramatta NSW 2124

Dear Commission

Re: Submission on Draft North District Plan and Towards our Greater Sydney 2056

I am writing in response to your public exhibition of the draft North District Plan (the draft Plan) and *Towards our Greater Sydney 2056*. Mosman Council, as one of the local government areas within the North District, is well-placed to provide comment of the draft plan, including its content, proposed actions and implications for Mosman and the region. As part of the North District, Mosman has been involved in planning networks and discussions with councils within the District, and shares common ground with these other councils on certain matters that will be discussed below.

The draft Plan was the subject of a report to Council on 7 March 2017 when it was resolved that a submission be prepared addressing the following issues:

- a) Strongly support the Greater Sydney Commission's position on the importance of the scenic quality of Sydney Harbour and its surrounds and the need to protect it.
- b) Ensuring future investment decisions for infrastructure continue to support the population in the North District. In particular the provision of a vehicular tunnel connecting the Northern Beaches to North Sydney.
- c) The over reliance on planning proposals to address planning issues and affect change.
- d) The future growth and change of local centres in Mosman, such as Spit Junction, in view of the draft Plan's stated action to increase housing capacity across the North District, and in particular to identify urban renewal opportunities associated with investment in transport.
- e) The lack of opportunities for additional open space, in particular land for active recreation.
- f) The limited impact the affordable rental housing target would have and the need for a whole of government approach rather than considering the issue of a planning problem that would be rectified by increased housing supply.
- g) The failure to identify the 'value capture' from development and the rezoning of land as contributions towards the provision of public infrastructure.

- h) Furthermore that the issue of current traffic congestion be addressed prior to compelling Council to add extra dwellings in the Mosman LGA.

Draft North District Plan

There are a number of positive aspects to the draft Plan which point to a new strategic direction for planning in Sydney, including its recognition within the *Environmental Planning and Assessment Act 1979* and its attempt to address some difficult issues like affordable housing, centres development and protecting urban services land from residential development.

The preparation of the draft Plan by the Commission under the changes brought about by the amendments to the Act has introduced a clear hierarchy of strategic plans in the State. This change is a good one as it provides statutory weight to plans. The focus of the Commission in preparing the draft District plans within the required timeframe and its desire to listen and engage with councils and the communities is supported.

The structure and length of the document should be reviewed. It is a document with a lot of valuable content but its structure and length contribute to it being difficult to read by a wide and varied audience as a consultation document. It has lack of clarity between priorities and actions across the three chapters and its overall objectives are not clearly articulated or visible. Matters to be reviewed regarding document structure include:

- Incorporating an Executive Summary upfront and editing the Introduction so its function is not confused with disparate content. It needs to 'set the scene' for what's to come in the following chapters.
- A clear and logical structure within the chapters that link the vision to the objectives and priorities and then to actions.
- Reviewing language used in both the Priorities and Actions to ensure that they convey what is intended.
- Omitting sections and paragraphs that could be included in other background documents or on the website. There are numerous examples of this, including the one on page 104 section 4.5.

A Productive City:

A notable omission of the draft Plan is a transport priority and associated actions. The links between effective transport networks and traffic movement, and the productivity of the city are well documented and don't need to be reiterated here, however, it is not a focus of the draft Plan. Parts b) and h) of the Council's resolution relate to this issue.

The focus of the draft Plan is on strategic and district centres of which Mosman has none. There are references to local centres but little detail is provided. A number of statements within the chapter allow for change in local centres. It is council's contention that planning for local centres is a local matter that would be addressed in strategic documents development with local communities. The District Plan needs to make a clear statement to this effect.

The draft Plan identifies that infrastructure in NSW is presently funded through a range of mechanisms. One mechanism is the concept of value capture or sharing, which uses part of the economic uplift that new infrastructure and planning generates to help fund that infrastructure. This increased value that would be realised through planning proposals is addressed by the District Plan in relation to provision of affordable rental housing, however, there are other opportunities for community benefit through this funding model.

The draft Plan notes that the GSC will continue to work across government on the amount, mechanisms and purpose of value sharing to create a more consistent approach to capturing

value for public benefit, complementary with other existing mechanisms. Working towards a robust and transparent system with both levels of government is a much needed initiative, however, it is considered that the draft Plan needed to provide a stronger statement about the role of value capture in planning and development and the funding for public infrastructure.

A Liveable City

For many years Council has had a consistently applied Housing Strategy that has formed the basis for Mosman LEP 2012. Reviewing this strategy and preparing one in accordance with the Commission's requirements is supported as a new strategy will give renewed weight to our current planning framework and inform future planning decisions. The five year housing target for Mosman is considered to be reasonable and achievable within the timeframe and within the existing planning controls.

Affordable Housing:

Congratulations to the GSC for putting this issue at the forefront of discussions about planning in Sydney. The Affordable Rental Housing Target is a good initiative but it is likely to 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.

Arts and culture:

While the document gives appropriate weighting to The Concourse as a major piece of cultural infrastructure with regional significance and associated economic benefits, it does not give appropriate weighting or recognition to the Mosman Art Gallery (which it lists along with a range of small community based facilities). Mosman Art Gallery is classed as a regional gallery and is recognised as the most significant and influential visual arts facility in Northern Sydney. It receives funding from local, state and federal governments as well as private sources and regularly receives national and international recognition for its programming. It also houses the most important collection of historic and contemporary artworks in Northern Sydney.

Shared spaces:

The notion of sharing school spaces for community purposes is supported, however, in established areas with limited active recreational open space opportunities, the school themselves have limited resources and look to council facilities to satisfy their needs. The capacity for further sharing spaces in these circumstances is therefore limited. It is noted that this priority for shared spaces extends to private schools as well as public schools, which begs the question of why wouldn't the strategy be extended to other land uses apart from schools? Are there other private sector buildings or sites which aren't used all the time that could be adapted for alternative uses at other times?

Open Space:

The challenges of acquiring additional open space are well-understood, however, in a city with an increasing population and a government policy for increasing density, it is disappointing that the draft Plan hasn't taken a stronger position on the need for additional open space. New active recreation spaces are not being planned for and they are crucially important for children especially, but adults as well.

A Sustainable City

Sustainability Priority 2 to protect and conserve the values of Sydney Harbour, together with Sustainability Priority 7 to improve protection of ridgelines and scenic areas, are strongly supported. Their inclusion in the draft Plan provides statutory weight to the importance of areas

like Mosman's Scenic Protection Area and will play a significant role in our continuing efforts to permanently protect this area from inappropriate development.

While Council supports this inclusion in the draft Plan, it is considered that the Sustainable City section is not as well considered and the least convincing of the three chapters. A number of actions relate to very specific detailed work rather than higher levels aims and actions.

Towards our Greater Sydney 2056

The reimagining of Greater Sydney as a three centred city demonstrates that the Commission can show leadership in planning for the city. The North District is within the Eastern City, virtually all of which has established areas. Some issues that may be of concern with this approach for our district are:

- The east/west division of the city doesn't acknowledge the traditional north/south divide either side of Sydney Harbour/Parramatta River. The physical division between the two results in accessibility, mobility and amenity issues which affect access to jobs, housing and recreation. It also requires a higher level of investment in public infrastructure to try to ensure the "eastern city" can function in a co-ordinated and efficient way. The change in Government focus to east west only may affect investment decisions for future infrastructure, such as a tunnel under Neutral Bay and Mosman or an extension of the North Metro train line to the east.
- Attention in the new metropolitan plan would likely be on the growing areas to the west of the city and especially growth generated by a new airport. New investment in education, transport, and health in the established eastern city may be a casualty.

Other General Comments

- Repetition and other editing - A tighter editing review is required, for example, on page 105 the two columns of text relating to design-led planning are in the wrong order. On page 107 Plan for safe and healthy places, it is considered that reference should be made to other research not just that documented by the Heart Foundation.

Some repetitive phrasing and statements are scattered throughout the document. Some of them, such as the ideas expressed on page 116 under 4.8.4, describe an aspect of the District or its context. This is important, however, it doesn't need to be reiterated at multiple sections as an introduction to a new idea.

- Terminology: there is reference in the document to strategic plans which is inconsistent with the definition of the term under the Act. For example, In the blue box regarding Productivity Priority 2, it includes:
"When preparing strategic plans, the relevant planning authority needs to demonstrate..."

The definition of strategic plan under Part 3B of the Act is -
strategic plan means a regional plan or a district plan

It is recommended that a review of terms used in the draft Plan be undertaken to remove any ambiguity.

- Co-ordination with other State agencies: There are current instances of inconsistencies between what the GSC is trying to achieve and the planning agenda of the Department of Planning and Environment. Some current policy direction of the Department, such as extending complying development types have the potential to undermine GSC priorities such as the Green Grid and extending the urban tree canopy. When the document states "we

support" does this refer only to the GSC's position or by default can we assume that this will be a whole of government position?

- Maps: there are a number of examples of maps which are missing detail, for example Figure 4-12: Secondary schools in the North District (2016), shows no schools in Mosman when there are two - one government and one non-government. The same applies to all of Mosman's seven primary schools which are missing from Figure 4-13. The legends on Figures 3.7 - 3.10 are not consistent. Their readability would be enhanced if they were the same.
- Implementation: While recognising the requirements under the section 75A1 of the Act for council to prepare such planning proposals under section 55 as are necessary to give effect to the district plan, there are a number of actions and priorities within the draft District Plan that would be implemented by mechanisms other than planning proposals. For example, Liveability Priority 8: Support the creative arts and culture.
- Images: Various images are used throughout the document to illustrate issues. Their effectiveness would be improved if they were labelled (for example, where are they what are they illustrating?).
- Work for councils: Throughout the document there are references to work required by councils. This is an important function of the District Plans and is consistent the hierarchy of plans within the Act. It would be a valuable amendment to the Plan if these were either consolidated into a list or distinguished consistently in the document. For example, page 54 "Councils are encouraged to review their local centres for revitalization work." Page 65 "...local governments to develop comprehensive walking and cycling networks.."

Thank you for the opportunity to consider the draft Plan and provide feedback. I look forward to continuing to work with the Commission on planning for the District.

Yours sincerely



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