



The Western Sydney Region Perspective in response to the

Greater Sydney Commission's Draft District Plans and *Towards Our Greater Sydney 2056*



March 2017

Western Sydney Regional Organisation of Councils Ltd

Level 1, WSROC House, 49 Campbell Street
PO Box 63, Blacktown, NSW 2148
Tel (02) 9671 4333 | www.wsroc.com.au

Contact:

Charles Casuscelli, CEO
Charles@wsroc.com.au
02 967 14 333

Contents

1. Introduction and background	3
2. General comments.....	4
3. Productivity.....	8
4. Liveability	11
5. Sustainability.....	13
6. Conclusion.....	16

1. Introduction and background

1.1 About WSROC

Thank you for the opportunity to provide feedback to the Draft District Plans and *Towards Our Greater Sydney 2056*.

The Western Sydney Regional Organisation of Councils (WSROC) represents nine councils in Western Sydney which together provide services for over 5,500 square kilometres, ranging from densely populated metropolitan areas to rural lands and the World Heritage Area of the Blue Mountains. The region's population is 1.8 million and is expected to increase by almost 1.6 million over the next 20 years.

WSROC provides a strong voice for the residents of Western Sydney to improve quality of life. The organisation has a reputation for considered policy analysis and advocacy on a wide range of issues affecting the residents of Western Sydney. WSROC also manages a number of projects, which are either funded jointly by its members or from external sources.

We welcome the opportunity for WSROC and its councils to provide feedback, ideas, information and expertise to assist in developing an integrated planning framework to grow Sydney in a sustainable and equitable way.



1.2 This submission

Please note that this submission focuses mainly on issues of greatest concern to our member councils and is not a comprehensive review of all elements of the draft plans. The WSROC region stretches across three districts and our feedback is therefore to be seen as high level commentary that touches upon issues across all districts. Lack of comment on detail of each individual draft plan does not necessarily imply WSROC support. WSROC member councils will also have made their own submissions, which should be considered separately and in addition to this response.

2. General comments

WSROC congratulates the NSW Government for its acknowledgement of the need for an integrated and holistic planning approach to the Sydney Region and we commend the Greater Sydney Commission (GSC) for its work to date.

The District Plans provide a critical link between high level, strategic planning at the State level and how this guides and influences planning at the local level. The draft Plans are a good first step towards establishing an effective strategic planning framework. More work however is needed to inform the final version of the District Plans to ensure they provide adequate strategic direction to guide local planning.

One of WSROC's primary concerns is the current lack of detail regarding priorities and timeframes. WSROC argues that this is fundamental in order to achieve the intended outcome of creating a balanced and liveable metropolitan Sydney.

Our councils further agree that a greater emphasis and bolder vision for infrastructure provision is needed. The current draft plans and documents are fairly weak (at the vision level) around how people live in and relate to the city. A critical element to the broader, strategic view of Sydney's future needs to be a clear acknowledgement of the need to shift the balance of employment growth over time.

The balance of the Draft Plans still needs some nuancing to ensure that a socially just, culturally rich and sustainable city is part of the vision – as is the case for all great cities. We argue that whilst we support the intention behind the liveability framework that underpins the plans, the specific actions outlined to address liveability are primarily concerned with affordable housing and are largely silent on other critical liveability issues, such as health, education, culture and arts.

Current Local and State planning controls will not produce the desired outcomes of the Draft Plans. In the context of rapid growth and increasing overall density, codes and standardised guidelines are not only essential, they must be strengthened and incorporated into the planning approval process, in order for the vision of the district plans to be realised.

2.1 A note regarding the process

The District Planning process was initially undertaken by the Department of Planning and Environment (DP&E), with the formation of 'Technical Working Groups' (TWG) which included local government planners, representatives from state government agencies and the DP&E. The TWGs provided an opportunity for councils and NSW Government agencies to discuss and collaborate on a broad range of issues, at a very early stage in the preparation of the District Plans. The DP&E should be commended on this approach.

When the GSC were established to take over the preparation of the District Plans, the GSC requested councils re-submit all information previously passed on to the DP&E during the TWGs. This essentially duplicated a process that had already been undertaken, and added considerably to the timeframe taken

in preparing the District Plans that could have been used more effectively refining the information previously provided.

WSROC further expresses disappointment that Regional Organisations of Councils (ROCs) were not adequately consulted throughout the process. ROCs provide critical knowledge and expertise which should have been systematically tapped into throughout the process of developing the plans. We note for example that ROCs host NSW's regional waste coordination teams which would be able to provide detailed information and advice on waste planning and infrastructure. Due to lack of consultation, this has been identified as a major gap in the current draft District Plans.

WSROC has been seeking clarity about the process from this point onwards regarding how regional priorities are to be set. Harmonising priorities across greater Western Sydney that are covered by three District Plans should be considered a key outcome of the process and must accommodate local Government's views. WSROC is unable to identify when and how this is to be accomplished as the District Plans are "rolled up" into The Plan for Growing Sydney. Despite repeated attempts at having this addressed nothing is being done as far as WSROC is aware.

2.2 Lack of clear strategic objectives with measures of success

There are a range of priorities and actions identified within the draft District Plans, however there are no timeframes or measures of success to inform their implementation. WSROC argues that in order to achieve the intended outcomes, the District Plans needs to have clear, bespoke strategic objectives for each region that must link with specific measures of success, tailored for the Districts.

2.3 Western Sydney Airport

WSROC would like to see a stronger emphasis of in the draft District Plans and *Towards our Greater Sydney 2056* plan regarding the parameters that should be considered to ensure the planned Western Sydney Airport delivers the best outcome for the region's residents and businesses. The collective view of our councils is that planning for this project to date has been lacking. WSROC therefore urges the GSC to emphasise in the District Plans and the *Towards our Greater Sydney 2056* plan that during the planning and construction phases and after commencing operations a Western Sydney Airport must:

- Be optimised to contribute to the economic growth and development of Western Sydney by means of an appropriate airport plan, state of the art infrastructure, and public transport from the outset of operations.
- Deliver equity, fairness and maintain quality of life for the whole Sydney basin and the Blue Mountains through an acceptable airport plan, curfew considerations, and comprehensive noise mitigation plan for residential dwellings.
- Be subject to stringent environmental controls, developed following detailed and comprehensive assessment of the environmental impact, including protection of the UNESCO listed Blue Mountains Greater World Heritage Area.
- Ensure equitable outcomes for all Greater Western Sydney residents by designing and implementing flight paths that limit the noise exposure of any single community.
- Include an employment policy and action plan that supports Western Sydney residents through apprenticeships, traineeships and priority access to local jobs.
- Be supported by a procurement policy that preferences Australian manufacturing and services, and supports the Western Sydney economy.
- Include non-road options (pipeline or rail) for the delivery of fuel to the airport and one option to be implemented in time for the opening of the airport.

2.4 Boundaries – they are a mess

WSROC expresses its concern regarding the jumble of legal, administrative and operational boundaries that impact upon local government currently in existence that create confusion, omission, duplication and frustration.

2.4.1 Greater Western Sydney, Western Sydney, and Western City?

Government agencies, both State and Federal have been engaging with the sub-region based on an understanding of Greater Western Sydney primarily defined by location and communities of common interests, these included Wollondilly, Campbelltown, Camden, Liverpool, Fairfield, Blue Mountains, Penrith, Blacktown, Parramatta, Cumberland and The Hills local government areas. What is the future of sub-regional engagement, is the notion of a Greater Western Sydney or indeed Western Sydney now become redundant? What will take its place?

2.4.2 Administrative boundaries used to determine membership of forums?

Regardless of the advice of the GSC that District Boundaries should be regarded as an administrative convenience the Federal Government has used them to establish the membership of the Western Sydney City Deals governance arrangements. Based on the West and South West Districts the forum excluded Blacktown Council because it was simply a member of the Central West District ignoring the obvious fact that Blacktown Council (the largest in the Region) would affect and be affected by the Western Sydney City deal to a great extent.

2.4.3 Alignments that do not make sense?

On a broader scale the Sydney metropolis is now transitioning from a dual CBD model to a Three City model, the three city construct comprises 6 Districts, three of which are located in Greater Western Sydney that currently comprises two Regional Organisations of Councils.

As if to make the point absolutely clear, the proposed Western Sydney Airport and its surrounding aerotropolis is virtually cut in half by the boundary between Penrith and Liverpool Councils that is also the boundary between the West and South West Districts.

Another example is that Hawkesbury, Penrith and Blue Mountains LGAs have been bundled together with Hunter and Central Coast LGAs to create a Destination NSW Network “Sydney Surrounds North” to be located somewhere within the jurisdictional footprint. What the Hunter and Central Coast Councils tourism goals and objectives have in common with the three Western Sydney Councils is the subject of much mirth.

These mis-alignments, regardless of whether they have their origins from historical carry-over, administrative convenience or from deficient considerations can be counterproductive when the aim is to ensure planning for “Greater Western Sydney” is truly integrated and streamlined across agencies, sectors and levels of government.

2.5 Discrepancy / lack of integration between Districts and the Three Cities

WSROC further notes that the District Plans are largely generic documents with common priorities and actions across all six Districts. As a result, the content does not seem to capture the unique attributes and opportunities of each District. Identified actions and priorities are not always consistent between the Draft District plans, even where it is clear they should be. For example, the draft South West District Plan includes an action to ‘Identify alignments and preserve regionally significant north-south and east-west rail and road corridors for the Western City’. No such action is identified within the draft West District Plan.

The “Three Cities” concept is the core strategic component of the proposed metropolitan planning approach by the GSC for Greater Sydney. However, using the geography of the six Districts based around LGA boundaries produces artificial outcomes which do not properly reflect the Three Cities concept. WSROC would argue that the Three Cities better reflect the regional economic, social and environmental roles, priorities, issues and interactions than the District boundaries.

That said, the Three Cities concept is flawed in its under-representation of other LGAs such as Fairfield, Blacktown, the Blue Mountains and Hawkesbury LGAs in the strategic plan for the future of metropolitan Sydney.

These LGAs play significant roles in Greater Sydney’s recreation, tourism, manufacturing and agricultural industries. Careful consideration needs to be given to how these areas will contribute to our city’s future, particularly in connection with the Western City and Western Sydney Airport.

Lack of focus on these LGAs not only fails to harness their unique contribution to Greater Sydney, but also ensures that the needs of residents in these areas are overlooked – leaving them outside the scope of both metropolitan and regional planning.

2.6 The role of the NSW Government is unclear in the District Plans

Whilst the District Plans frequently identify state agencies as the lead for a number of actions, it is unclear what these agencies will actually do to deliver these actions. The District Plans identify a number of matters that local government needs to consider in preparing a planning proposal, however is silent on what the associated NSW Government role is delivering on these matters.

2.7 Implementation process has not been properly considered

Under Section 75AI of the Environmental Planning and Assessment Act, councils are required to give effect to the District Plans through LEPs as soon as practicable after the District Plans are finalised. WSROC urges the Commission to properly acknowledge implementation issues councils may face in managing both the large volume of strategic work, and LEP amendment processes. These processes are both resource and time intensive, and should be referenced as such and accommodated accordingly in the District Plans.

2.8 Value capture and strategic land acquisition

The best form of value capture is the one where real future value is generated from public infrastructure investment by the State government in those areas where the Government has historical or strategic holdings of land. The State investment is returned by value capture on Government owned land and returned to the people of NSW and not to developers and other speculators. The ability and the will of the NSW government to acquire strategic land holdings through long term acquisition has greatly diminished over the past couple of decades and the loss of this capital funding stream to the NSW budget should be a matter of some concern to the Government.

It is suggested that the objectives of the District Plans appropriately shaped by knowledge intrinsic to Government Departments can provide the necessary guidance for Government to develop a strategic lands acquisition program. This program would establish an asset pool of lands that would return substantially more than many other investment opportunities for Government.

We would recommend an aggressive program of property acquisition consistent with market norms to support the record levels of public infrastructure investment by the NSW Government.

2.9 Legislative context

The District Plans and the regulatory context in which they sit are very important to the success, or otherwise, of the implementation of each Plan’s priorities and actions. This context has not been

resolved. Further, each of the priorities under a Productive, Liveable and Sustainable City, state that “How these matters are to be taken into account must be demonstrated in any relevant planning proposal”. This wording allows for considerable variability in implementation across each District Plan and even within each local government area. The lack of distinct criteria for meeting these priorities will make it difficult to measure and enforce the values of productivity, liveability and sustainability in real-world planning proposals – in turn diluting the outcomes the District Plans aim to achieve.

3. Productivity

WSROC applauds the Commission’s vision of a metropolis of three cities, two of which are hosted by the people of Western Sydney. WSROC believes that Sydney’s performance and the welfare of its people is heavily influenced by the location of housing, amenity, and the ability to access employment opportunities. .

3.1 Rebalancing the city

WSROC supports the powerful message of rebalancing the city however the District Plans themselves must do more to redirect the flow of resources across the metropolis. A greater proportion of employment must be created in Western Sydney, with government infrastructure and land use planning deliberately nurturing and exploiting the region’s comparative advantages. Employment lands should be as much of a focus as housing, ensuring high value knowledge jobs are pursued as well as identifying sufficient land for variety of uses needed to support the efficient operation of Sydney.

Our residents must be at the centre of these plans with government providing meaningful choices in housing diversity and employment opportunities through economic diversification and expanded transport options. Transport should connect labour markets to firms but also provide firm to firm and customer to firm connections. This will require links to the three cities from surrounding neighbourhoods and centres as well as fast links between the three cities. Western Sydney also needs better access to recreation and essential services where possible; locating facilities locally and through government investment in improved connectivity to access Sydney’s offering of the arts, culture and natural environment.

3.2 Integrated place based planning

WSROC is disappointed that the integration of infrastructure planning with land use planning isn’t more advanced. More detail was expected on prospective projects and the development thresholds that would trigger government investment. Similarly, WSROC believes that the plans would benefit from clarity on the role of local infrastructure contributions and the need to better use the Sydney Region Development Fund to deliver the Commission’s vision. Managing the delivery of local infrastructure is a significant challenge for local government and increased certainty in how the District Plans interact with the existing contributions policy framework would benefit councils, industry and the local community.

WSROC commends the Commission in positioning these Plans within government as a test of strategic fit for infrastructure investment. A shortcoming of organising this information by District is that there is an overemphasis of the administrative District boundaries rather than spatial activity centres of the three cities, strategic centres and precincts. It is unfortunate that *the local government areas needed to support the Western Sydney Airport, and therefore the third city, lie across three different Districts.*

WSROC understands the role of District Plans in providing guidance on the implementation of State strategy and is mindful of their role in shaping and managing Sydney’s growth.

3.3 Reshaping the metropolis

WSROC has long advocated for stronger role for Western Sydney in driving Sydney's productivity and international competitiveness. There is tremendous opportunity for the growing Central City and the new Western City to provide economic benefits of national significance.

To take advantage of these opportunities, WSROC asks for a commitment to the development and delivery of economic development strategies in the Western and Central Cities.

3.3.1 The Western City

The identification and protection of strategic north-south and east-west corridors is an issue of national priority and must be confirmed as part of planning for the Western Sydney Airport. City shaping transport investment can connect the Western City to the rest of Sydney and an expanded greater metropolitan region that includes the Illawarra, Central Coast and the Hunter. A functioning Western City will also strengthen the interaction between Sydney and the regions of the Central Tablelands and the corridor to Canberra.

Strategic sites for public purposes such as transport corridors and social infrastructure should be identified and protected. Land for tertiary education facilities should be protected and made available to local and international providers of higher education to ensure the organising principle of the 30-minute city is available to all residents of the Western City.

WSROC recommends that a funded corridor and strategic sites program be established immediately to identify, protect and acquire strategic lands to demonstrate government's commitment to the Western City.

The Western City (or is it the Western Sydney) City Deal provides an opportunity to resource and deliver investment to enable the development of this city. WSROC believes that the three tiers of government must develop a new citizen-centric approach to how integrated planning must occur across jurisdictions. This includes the need to harness opportunities across the three Western Sydney Districts, with a governance model that delivers predetermined productivity, liveability and sustainability outcomes. These outcomes should respond to the need to protect the region's peri-urban lands and tourism, while providing land, infrastructure and services for new communities and employment centres.

WSROC recommends consultation with local government to confirm the performance requirements for the Western Sydney Airport to best support the delivery of the Western City. These requirements should be documented in both the final District Plans and the Western Sydney - City Deal.

3.3.2 The Central City

As Sydney's geographic centre, Greater Parramatta has the potential to access the nation's largest and most diverse labour market; fostering innovation, productivity and economic resilience. It is essential that Parramatta is connected to its surrounds, able to access a labour market hinterland in every direction. Government should continue to relocate its administrative functions to the Central City as well as incentivising additional employment in research and professional services to the area.

WSROC commends the Commission on the development of the Greater Parramatta Olympic Peninsula initiative but there is more to do to complete the task. More effort is required to develop industry plans to exploit agglomeration benefits and connections with other centres in Western Sydney.

The Central City plays a unique role as the bridge between the Western and Eastern Cities. Mass transit investments that connect the Central City to the Western and Eastern cities must have clear project objectives relating to the Three Cities vision. A well designed West Metro integrated into the existing rail network in Western Sydney can transform the way the three cities interact in the Sydney metropolis.

WSROC requests that councils representing residents that access rail services west of Parramatta be engaged in the development of the design of the West Metro and related changes to the existing network including consultation on project objectives.

3.3.3 The Eastern City

WSROC member councils are not located in the Eastern City but many of their residents access the city's employment opportunities, cultural and recreation assets. Planning for the Eastern City must include equity and access outcomes for the whole of Sydney ensuring the benefits of growth are distributed. WSROC acknowledges the government's significant infrastructure investments in response to increased congestion arising from travel patterns from West to East.

The alternative to the continuous expansion of transport capacity along these corridors would be an intervention reducing the need to travel between Western Sydney neighbourhoods and Eastern Sydney employment hubs.

WSROC recommends government consider options that change the flow of people to jobs in Sydney by investing in interventions that attract employment to Western Sydney.

3.4 Managing the development of the city

A twenty-year strategy needs implementation horizons to focus resources and effort. WSROC expected the draft District Plans to contain guidance on the prioritisation of precincts to be developed, and funding commitments for associated infrastructure. WSROC has previously welcomed commitments to catalytic infrastructure projects such as those in previous rounds of the Housing Acceleration Fund and would support additional rounds of funding for this program.

The pace of change in some areas of Western Sydney is placing pressure on existing communities and their ability to access government services. Issues relating to service accessibility relate not only to proximity but also the availability of option and their cost.

WSROC recommends that District Plans include a commitment between state and local authorities on the provision of infrastructure and services to support development. This commitment would reassure communities that new developments will not erode the quality of existing services, and that government has arranged for a fair distribution of the benefits of growth. The commitment should incorporate the adequate provision of employment lands and affordable housing, both of which are supported by WSROC.

WSROC supports the governance model of the Commission, including the establishment of the Commission's Infrastructure Delivery Committee. The District Plans need to have more detail on how the Committee, in partnership with local government, can integrate infrastructure and land use planning to implement the District Plans.

3.5 Operating the city

WSROC welcomes the introduction of the Greater Sydney Commission dashboard to monitor the performance of Sydney. The use of data and the development of capabilities in city analytics is crucial in driving improvements in evidence based decision making.

By understanding the performance of places across the metropolis, state and local government will be better able to bridge the gap between those areas in Western Sydney that are underperforming compared to the city average. It is crucial that the Commission encourage government to focus not just on servicing growth but responding to those parts of the metropolis that have backlog infrastructure and below average productivity, liveability and sustainability outcomes.

In finalising the District Plans WSROC asks the Commission to revisit two levers of implementation that should be strengthened.

- The Plans should refer to local government's role as a place manager and strengthen its role in the co-design of precincts and related infrastructure programs.
- The Plans have not sufficiently considered the opportunity to use technology to better operate our cities and precincts. There is little information on emerging Smart City opportunities that better use scarce resources or empower citizens through engagement.

WSROC believes that the Commission has an opportunity to drive the development of best practice capabilities in data analytics and city governance to improve decision making, reduce planning costs and improve confidence in the planning system. An opportunity exists to include these capabilities in the Western City – City Deal improving transparency and accountability, publicly tracking performance.

3.6 Need for local employment strategies

The District Plans only identify the need to prepare a local housing strategy, however there is no associated action to prepare a local employment strategy. Jobs are just as critical as housing, particularly for Western Sydney. Western Sydney has a number of employment precincts which should be reviewed in light of the District Plan and addressed in a new local employment strategy. Encouraging jobs growth in these precincts is critical to the overall success of the region. A local employment strategy would provide actions and priorities for how local government (supported by the GSC and other state agencies) could meet its job targets as specified in the District Plans, including protection and expansion of land zoned for business and employment.

3.7 Failure to provide an infrastructure plan

The draft District Plans need to provide an infrastructure plan to help facilitate the significant growth in jobs and dwellings the region will experience over the next 20 years. The infrastructure plan needs to go further than simply listing the current infrastructure projects that the NSW Government has committed to – this is not strategic enough and does not address long term chronic issues. The plan needs to be visionary, and identify game changing infrastructure projects that will help the Districts achieve their full potential. We encourage the GSC to be bold in its infrastructure vision for Western Sydney and to include timeframes to initiate these projects.

3.8 Un-serviced lands

Many Western Sydney councils currently struggle with un-serviced lands (no sewer, water, electricity etc.) for both industrial and residential sites. Because of this, councils experience a massive drop in investment, especially as some lands are not scheduled to be serviced for many years.

The announcement of new priority growth centres and the associated drain on limited resources further delays action that could possibly yield more immediate results.

4. Liveability

WSROC notes that the liveability actions listed in the draft District Plans mainly target affordable housing. Whilst WSROC recognises that affordable housing is one of the key pressures Western Sydney currently faces, we express our concern regarding the lack of detail, especially the omission of actions, on other critical liveability measures such as health, education and arts and cultural development.

4.1 Affordable housing

WSROC identifies that there is an urgent need for leadership in affordable housing. The draft District Plans propose an affordable rental housing target range of 5-10% of new floor space (above existing

permissible floor space) to be applied at the rezoning stage. Whilst we support the implementation of a target, WSROC recognises that specifying a range of 5-10% will only deliver 5%. We therefore urge the Commission to undertake further investigations to provide improved guidance for affordable housing and consider increasing the target to strengthen the delivery of much needed affordable housing.

WSROC further supports the aim to diversify housing supply. In order to ensure housing is not just affordable, but also adaptable and of appropriate quality.

WSROC would like to highlight the current urgency of need for action beyond the housing target. We also note that unless affordability and diversification of housing is mandated to a degree, the outcome might not sufficiently address Western Sydney's current and future needs.

At a more strategic level it appears that too much attention is given to the less than 1% of housing stock which is the new contribution and not enough to the existing stock (and its turnover which forms the vast majority of supply). This fiddling at the margin will not produce a significant effect.

The value of the product at the fringe, the 1% referred to above, is inexorably linked to the value of the adjoining home, and so on. Changing the input costs (such as taxes) does absolutely nothing to the price of the product. What it does do is create a flow back to the residual land value of properties on which the development of the new product takes place. These pricing dynamics must attract greater Government investigation and a strategy to deal with existing stock turnover be made a priority.

Another opportunity worth exploring is that across the Sydney Metropolitan area some 134 sites have been identified as being suitable for development above the rail corridor and adjacent to railway stations. These sites would be ideal for developments focusing on affordable housing. The engineering and economic challenges associated with building above rail corridors are diminishing by the day and a serious attempt at identifying these Tier 2 opportunities (i.e. other than the massive developments above CBD stations and the Central/Redfern/Eveleigh precinct deserves Government support.

4.2 Arts

WSROC notes that actions around arts and culture are largely absent from the draft District Plans. We argue that arts is critical in developing productive, sustainable and liveable communities. Unfortunately, despite former initiatives to develop a strong and vibrant artistic industry in Western Sydney, there remains a worrying inequity between Western Sydney and other regions (NSW or Sydney) when it comes to arts employment, infrastructure, audience building and funding.

Proportional investment and planning for locally-relevant artistic experiences for Western Sydney residents - including world-class infrastructure, resources and support for Western Sydney artists and groups – needs to be recognised as a priority for Western Sydney.

WSROC further notes that the mapping of Western Sydney arts undertaken by Arts NSW is not referenced in the Draft Plans. However, the outcomes of that research should provide valuable insights into the gaps and needs for the region and should be used to inform targeted actions and priorities.

WSROC therefore recommends the development of a Western Sydney arts strategy to address this imbalance. The strategy should be informed by the Arts NSW mapping outcomes.

4.3 Health

Western Sydney currently faces a critical health crisis. Compared to the national average, Western Sydney suffers much higher rates of lifestyle-related chronic diseases such as diabetes; a condition that is two to three times more prevalent in Western Sydney than the Sydney CBD.

This puts major pressure on our services and reduces Western Sydney's productivity. WSROC is therefore concerned about the lack of focus on health in the current draft District Plans. Health specific objectives and outcomes appear to be weakened in the draft plans, compared to *A Plan for Growing Sydney*. WSROC recommends that health and wellbeing be listed as a key principle informing every aspect of the planning process, and included as a 'liveability priority' with associated actions.

WSROC further argues that responding to the current health crises requires collaboration and commitment across all levels of government. An integrated planning and health strategy is required to develop active and healthy cities. This strategy must:

- Include the development of ongoing education programs - to include all aspects of creating "smarter" people who can live resiliently, self-sufficiently and co-operatively.
- Create diverse and widespread opportunities for recreational and incidental physical activity.
- Make active travel with a focus on walking, cycling and integrated public transport the easy option.
- Provision of and access to open, green space to address impacts of heat stress on health.
- Ensure higher residential density is well designed and liveable.
- Facilitate connected, safe and inclusive communities.
- Provide equitable access to fresh, healthy food.

4.4 Youth engagement

WSROC recommends the inclusion of the development and implementation of a youth strategy in the plans. This plan should address youth engagement in general and unemployment specifically. It is critical to engage with young people early on in the process to ensure participation increases by establishing meaningful connections and foster a sense of belonging.

4.5 Education

WSROC is concerned with the lack of education priorities and actions in the current plans. Quality and accessible education is essential when building strong communities. WSROC therefore recommends the plans reflect a stronger focus on education, and priorities and actions to include:

- Recognition of the importance of vocational education, increase access and funding to TAFE and improve links to employment in Greater Sydney
- Need to operationalise the idea of "productive diversity" or "local diversity" and global connections, in order to mobilise employment and business opportunities.
- Stronger support for literacy and numeracy programs and support for schools with high ESL needs.
- Address public transport needs of students.

4.6 Representation and engagement of ATSI and CALD communities

WSROC would further like to see the development and implementation of strategies to increase participation among Aboriginal and Torres Strait Islander People and CALD communities. This is essential when creating cohesive communities. These strategies should include the representation on higher-level decision making and support to participate in social, economic life, employment.

5. Sustainability

WSROC is supportive of the outlined sustainability priorities for the three Districts. We particularly applaud the Commission's commitment to deliver the Western Sydney green grid. However, we would like to see stronger recognition and action on the issues as outlined below.

5.1 Regional waste management

A separate submission that focusses on planning related to waste and resource recovery issues has been submitted by WSROC for each district in the region. WSROC expresses concern regarding the lack of emphasis on waste infrastructure and planning in the current draft District Plans. The draft Plans list the need to identify land for future waste reuse and recycling as an action. Whilst this is needed and WSROC supports this action, we urge the Commission to recognise that waste should be planned on the basis that it is an essential urban service; as essential as water and energy.

A pressing issue for our councils is that waste management planning is commonly an after-thought for the developer, as it is not adequately legislated at the state level. Many amenity issues arise as a consequence of ill-considered waste management facilities in regards to odour, hygiene, noise, safety and visual blight. In addition, space for waste storage and collection, is often competing against developer costs and financial returns. This results in waste infrastructure that does not provide adequate amenity and fails to incorporate systems that encourage waste stream separation, recycling and prevent dumping on kerbsides, roadsides and in open spaces.

Planning for waste processing infrastructure at the Sydney metropolitan and regional level is also needed. A key aspect of securing the required waste processing infrastructure will be strategic land use planning, whereby a coordinated approach to land use and associated planning permits is developed among councils. This will also require action by the state to facilitate appropriate planning approvals adjustments and to develop a favourable context for the establishment of waste and resource recovery infrastructure.

WSROC urges the Commission to recognise the complexity councils face in balancing providing increased housing supply and choice and ensuring liveable dwellings with the essential urban service of waste removal provided. The fundamental issues that need to be recognised and adequately addressed across the West Central, West and South West Draft District Plans are:

1. the increase in expected resident populations in these areas and the impact it will have on the capacity of council waste management services to ensure amenity and safety of neighbourhoods in these regions;
2. the increase in expected resident populations elsewhere in Sydney and the impact this will have on capacity and performance of Sydney's main waste management facilities – the majority of which are based in Western Sydney;
3. the need to adequately manage encroachment of residential developments on industrial precinct lands that must be left available for the safe and clean operation of major waste management facilities that will serve Sydney's waste management needs.

More detailed information and analyses can be found in WSROC's separate submissions on the draft West Central, West and South West District Plans

5.2 Urban heat

Urban heat is a major issue for Western Sydney and WSROC is encouraged to see this being recognised throughout the draft District Plans. However WSROC urges the Commission to include the need for a regional approach to tackle this issue.

Our councils and other stakeholders have identified that there is a need to share knowledge of successful practices so they can be of benefit right across the region. There is also an urgent need for new practices and legislation at a range of levels. From planning to design practices and the need for scaled-up, heavy engineering responses involving green infrastructure, water bodies, energy and transport systems; so that the heat impacts of building and operating our growing city are significantly reduced.

WSROC recommends the Commission to include the following in the plans:

- **Planning:** Urban heat should be a consideration at the early stages of any planning process. WSROC recommends that planning controls are reviewed to ensure measures are implemented to reduce the Urban heat Island Effect (UHI). These measures should include, but are not limited to; review of facades and rooftops, review of use of HVAC in high density precincts, increase of urban greening, assessment of any project to ensure it does not contribute to the UHI.
- **Greening:** Canopy cover is one of the most effective ways to reduce UHI. Greening should be given priority in all planning. A Western Sydney urban greening strategy is needed and should include both existing and new developments.
- **Water:** water availability is another key element in ensuring UHI is minimised. Ensuring waterways are healthy, the implementation of Water Sensitive Urban Design and expansion of recycled water service provision are all important. Water accessibility in public places is also key to ensuring residents stay healthy, in this context infrastructure such as water bubblers and fountains need to be considered in high pedestrian places.
- WSROC would recommend that the Commission review what activities are currently being implemented across the region and assess their effectiveness. This will enable the identification of gaps and opportunities for a regional strategy.

5.3 Water management

With predicted population growth and climate change, Western Sydney will experience enormous pressure on existing water and wastewater infrastructure requiring future investment in augmentation. Increased water demand should be met by alternative water supplies including harvested stormwater and recycled wastewater. Recycled water should be used for non-potable uses including toilets, laundry, cooling and irrigation. Recycled wastewater preserves potable water resources and provides a climate resilient water supply creating water security for our growing city. It also maintains green space and enhances city greening and urban cooling.

WSROC recommends the GSC to incorporate water sensitive urban design (WSUD) more into the plans. And further to include more guidance regarding meaningful cross agency collaboration for every infrastructure project being undertaken on public land early in the project planning phase. This enables limited public open space to be potentially used for multiple purposes and achieve multiple outcomes. It will encourage better utilisation of existing and planned corridors for transport, water, wastewater, stormwater, energy and communications as well enhancing the blue green grid.

5.4 Peri-urban agriculture

Urban sprawl poses a threat to Sydney's fresh food availability and accessibility. WSROC believes that the preservation and development of urban agricultural spaces, precincts and belts need to be incorporated in the plans. Community gardens are an insufficient response to food security and sustainability. WSROC asks the Committee to include the preparation and delivery of a Sydney urban agriculture strategy to look at food production within and on the edge of Sydney.

6. Conclusion

Through this submission WSROC expresses its support for the integrated planning approach which the Greater Sydney Commission is aiming to develop. This can provide the much-needed step forward in order to maximise the economic, social and environmental wellbeing of our residents. WSROC believes the Plans can also go some way to address the inequity that currently still exist between the different regions of our metropolitan area.

We strongly encourage the Commission to consider the issues highlighted in this paper. We have provided a summary of recommendations listed in the table below:

General comments	
Lack of clear priorities and timeframes	District plans needs to have clear, bespoke strategic objectives for their region that must link with specific measures of success, tailored for the districts also clarity re roles and responsibilities and implementation process
Administrative boundaries	Review administrative and other boundaries such that alignments are optimised to deliver specific outcomes, and one of them should not be administrative convenience
Priorities	Priorities not firm enough and could lead to considerable variability in implementation across each District Plan and even within each local government area
Consultation	Consultation to occur with local government to prioritise actions and inform implementation
Productivity	
Infrastructure vision	Greater emphasis and bolder vision for infrastructure provision is needed
Employment	Need for local employment strategies
Employment	Employment lands should be as much of a focus as housing
Economic development	commitment to the development and delivery of economic development strategies in the Western and Central Cities
Value capture – strategic lands	A distinct strategic program of land acquisition to optimise value capture for the people of NSW
Western City	A funded corridor and strategic sites program to be established immediately to identify, protect and acquire strategic lands to demonstrate government’s commitment to the Western City
Liveability	
Identified actions	Actions as outlined are largely silent on other critical Western Sydney liveability issues, such as health, education and arts
Affordable housing	Strengthen and increase current targets. Investigate the opportunities from better “processing” of existing stock turnover. Investigate opportunities for affordable housing above rail corridors.
Arts	The development and implementation of a Western Sydney arts strategy
Health	Development and implementation of an integrated planning and health strategy is required to develop active and health cities
Youth	Youth engagement strategy
Education	Stronger focus on accessible and quality education
ATSI and CALD communities	Strategies to ensure representation and engagement of these communities
Sustainability	
Waste	Waste should be recognised and planned for as an essential service
Urban heat	Development and implementation of a regional urban heat strategy
Water	incorporate water sensitive urban design (WSUD) more into the plans
Fresh food	Include the preparation and delivery of a Sydney urban agriculture strategy to look at food production

WSROC appreciates that local government has been consulted in the lead up of this submission period and we would encourage the continuation of this level of partnership. Ongoing consultation and collaboration with stakeholders such as local government is critical for the success of the plans.

The process still appears deficient in that region-wide priority setting has not been identified as a key activity involving the regional collective voice of local Government and we would urge that this be addressed in due course.

We look forward to working with the Commission in further refining the current plans and their implementation.