



SYDNEY COASTAL COUNCILS GROUP INC.

councils **caring** for the coastal Environment

SUBMISSION

Draft Sydney Regional
and District Plans

March 2017

To: Greater Sydney Commission

Prepared by: Sydney Coastal Councils Group Incorporated (SCCG)

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Submission on the Sydney Regional and District Plans

Established in 1989, the Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils with twenty-seven years' experience in leading sustainable coastal management. The SCCG comprises eleven Member Councils who represent approximately 1.5 million Sydneysiders and over 600 km of coastline.

The [Sydney Coastal Councils Group Strategic Plan 2015 – 2019](#) sets out three guiding principles which encapsulate the core ambitions of the SCCG, namely to:

1. Restore, protect and enhance the coastal environment, its associated ecosystems, ecological and physical processes and biodiversity.
2. Facilitate the sustainable use of coastal resources, now and in the future.
3. Promote adaptive, integrated and participatory management of the coast.

Our member Councils are fundamentally charged with urban and environmental planning of their local area, including managing the coastal zone (as defined in the *Coastal Management Act 2016*) and activities that may impact the coastal zone. The *proposed District Plans* (DPs) will have direct impacts and indirect influences on the health and resilience of our coast, the way we use our coastal resources, and the mechanisms we employ to manage this exchange in a sustainable way. The DPs aim to provide a key link between State legislative and policy directives and local environment plans (LEPs), and will guide the shape of our communities and the Greater Sydney Region's environmental assets and values for generations. It's therefore critically important we set appropriate long-term strategy and be ambitious with our goal setting, implementation, and monitoring. We must work together across traditional boundaries and barriers to fulfil our responsibility as guardians of a healthy, sustainable coastal environment.

The SCCG was formed to lead the sustainable management of the urban coastal environment. Its vision is to see resilient coasts, engaged communities, local leadership and have a regional impact. To achieve this the SCCG is a strong advocate for sharing responsibility and enhancing the necessary partnerships for coastal planning and management between governments of all levels, regional bodies, industry and different communities. We consider collaborative working, promoting transparency and the encouragement of participation as key actions to ensure positive outcomes for our coastal environment.

The Process

In pulling this submission together, the SCCG established a multi-party working group consisting of staff and elected representatives of member Councils, and invited representatives from other interested organisations and government agencies to contribute – including Local Government NSW, the Office of Environment and Heritage, and the Southern Sydney Regional Organisation of Councils (SSROC). A workshop was held on 7 March 2017, where feedback was sought, and then draft submissions were circulated for comment and finalisation to not only the working

group but also the SCCG Technical committee and Full Group. This feedback has been collated and summarised below and forms a critical element of this submission.

This submission also includes input and commentary from the SPLASH Network, in relation to water sensitive cities.

The Sydney Coastal Councils Group supports the submissions made by its member councils:

- Bayside Council
- City of Sydney Council
- Inner West Council
- Northern Beaches Council
- Mosman Council
- North Sydney Council
- Randwick Council
- Sutherland Council
- Waverley Council
- Willoughby Council
- Woollahra Council

Key Recommendations

The following list is a snapshot of some of the key recommendations arising from our analysis of the Regional Plan and draft District Plans for Sydney.

The SCCG recommends that:

- 1. A publicly available report addressing all submissions is produced.**
- 2. A clear, scalable program (or intervention) logic is developed for all plans.**
- 3. The *Implementation Plans* (if they are to be carried forward in their current form) be the subject of further detailed consultation.**
- 4. Outputs from the *Environment Panel Advisory Paper for the Greater Sydney Commission* (November 2016) are progressed and metrics included in both District Plans and Implementation Plans.**
- 5. Reconsideration be given to using catchment or natural system boundaries to address cross-boundary governance issues.**
- 6. Marine Spatial Planning is promoted at a Regional and District scale.**
- 7. Provision is made for the management of all hazards (natural and unnatural) in the DPs.**
- 8. Opportunities to expand the current development contributions system to deliver wider community and environmental benefits be explored.**
- 9. Greater emphasis be placed on delivering the blue-green grid, and linking the blue-green grid to the SSROC/SCCG Connected Corridors for Biodiversity habitat mapping.**
- 10. The principles of Water Sensitive Urban Design (WSUD) be integrated into all aspects of the DPs and that Greater Sydney adopt 'Water Sensitive City' principles.**

Further detail and recommendations are provided in the comments on the District Plans below and in Appendix A.

REGIONAL PLAN: COMMENTS ON TOWARDS OUR GREATER SYDNEY

The GSC's proposed amendment to 'A Plan for Growing Sydney (2014)' reconceptualises the Greater Sydney Region as a polycentric metropolis of three distinct, yet linked cities: Western City, Central City and Eastern City. The amendment, entitled 'Towards our Greater Sydney', outlines a vision for Sydney to a timeframe of 2056 and identifies three key themes to provide focus: productivity, liveability and sustainability. The three cities are in various stages of establishment, the Eastern City being the well-established economic engine of Sydney, while much of the growth over the near-term is anticipated to be in and around the Greater Parramatta area that makes up the Central City. The development of the Western Sydney Airport at Badgerys Creek and the cross-government Western Sydney City Deal provide the impetus for an emerging city on the western edge of the Greater Sydney Region.

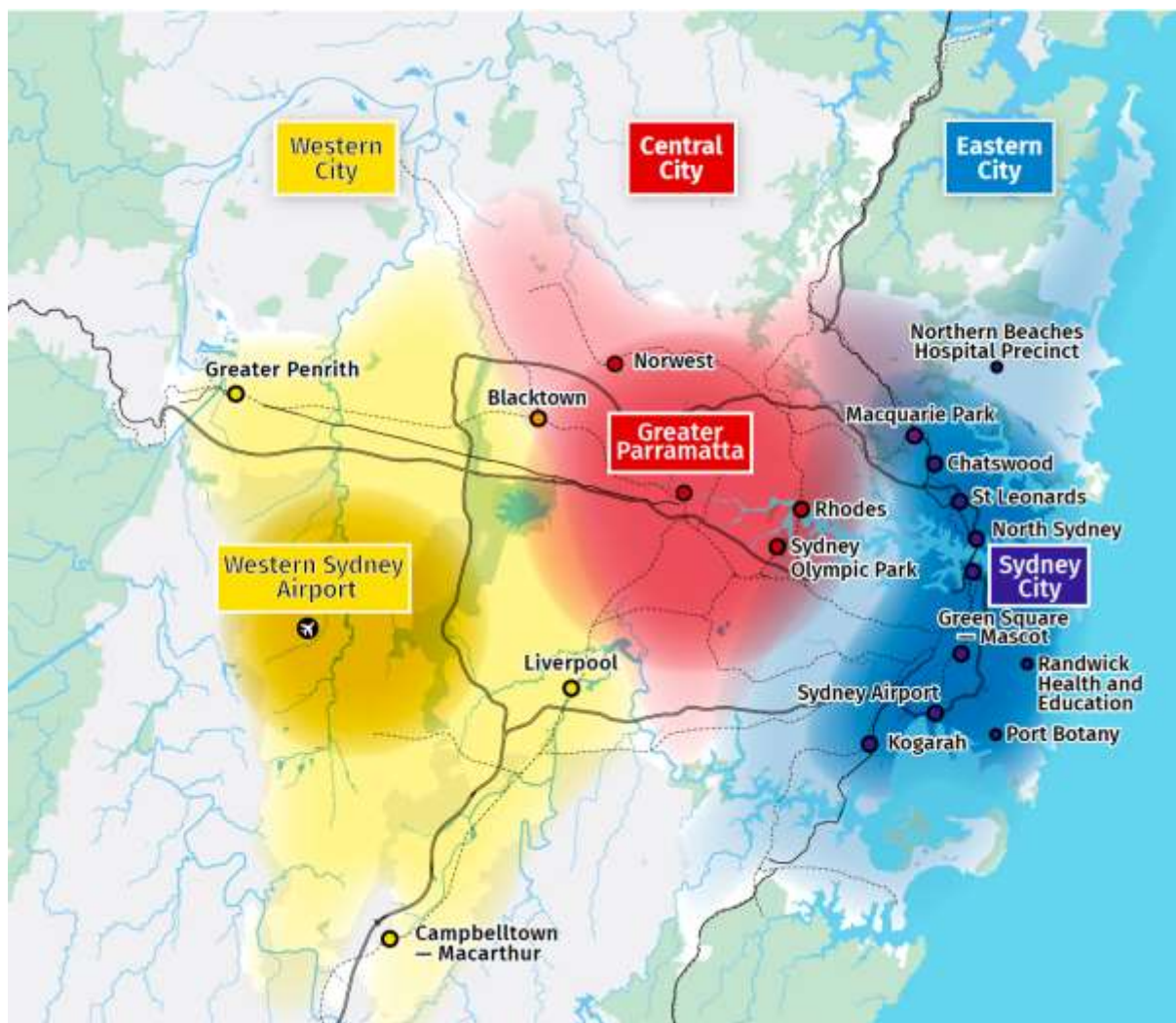


Figure 1 Vision for the Greater Sydney Region divided into a metropolis of three cities. Extracted from *Towards our Greater Sydney*

To deliver this vision the plan sets out priorities across three themes, summarised in the table below:

A Productive Sydney	A Liveable Sydney	A Sustainable Sydney
<p>A growing city</p> <p>A city with smart jobs</p> <p>A 30-minute city</p>	<p>An equitable, polycentric city</p> <p>A city of housing choice and diversity</p> <p>A collaborative city</p>	<p>A city in its landscape</p> <p>An efficient city</p> <p>A resilient city</p>

Figure 2 Summary of metropolitan priorities extracted from *Towards our Greater Sydney*.

The SCCG would like to stress that the above priorities should not be pursued at the expense of one another. All three themes of productivity, liveability and sustainability should be integrated in a triple bottom line approach to achieve balanced decision-making. The quest for 'balancing' these priorities must recognise the state-wide, long accepted goal of **Ecologically Sustainable Development (ESD)** that lies at the heart of all environmental and land use planning decision-making, and underpins our desired way of life. This strategic plan should not just be about "allowing a focus on Greater Sydney's natural environment, resilience and efficiency" but should go beyond that and make explicit the requirement to progress toward ESD¹.

Of specific relevance to the ambit of the SCCG are the region-wide priorities for a Sustainable Sydney, and the aims that support them:

- improve the health of **waterways**
- protect, extend and enhance **biodiversity**, regional and local **open space** systems, as well as scenic and cultural **heritage** together with productive landscapes
- increase access to open space, conserve the **natural environment** and enable healthy lifestyles and local food
- minimise and mitigate environmental impacts through the **efficient use of energy and resources**, recycling of water and materials together with the development of renewable energy sources
- identify and adapt to the impacts of **climate change** that are likely to increase
- minimise exposure to man-made and natural **hazards**
- strengthen social, organisational and **infrastructure** capacity by addressing chronic stresses in order to be able to resist and rebuild after the acute shock of natural disasters.

While the SCCG broadly supports the below high-level aims (as stated in *Towards our Greater Sydney*), the priorities and actions within the DPs must display a convincing trail back to those aims to ensure their achievement. The development of an appropriate program logic would deliver that.

The SCCG supports the 100 Resilient Cities initiative and recognises the return on investment (the *resilience dividend*) provided by inter-dependent actions that reduce impacts to individuals, the physical environment and the economy from major shocks, stresses and disruptions. For example, improving the resilience of the city's infrastructure network at all scales is a critical action to ensure the continuity of a normal functioning society in the event of a disaster. Links with emergency

¹ For example, there are many benefits to liveability from having appropriate Integrated Water Cycle Management (IWCM) and links with other programmes and plans like the 2017 Metropolitan Water Plan <https://www.metrowater.nsw.gov.au/2017-metropolitan-water-plan>

management² should also be explicitly considered upfront in strategic planning so that we are in a position to better *prevent, prepare, respond* and *recover* from disasters. A key example here would be the ability of residents of the Hawkesbury floodplain to safely evacuate along designated routes in the event of a Probable Maximum Flood. Investment in these corridors would provide multiple benefits not only to public safety in the event of a major flood, but also in terms of connectivity, productivity and liveability.

DISTRICT PLANS: COMMENTS ACROSS DISTRICT PLANS

There are six Districts delineated within the Greater Sydney Region, three of those overlap with the SCCG’s member Councils: [1] **North** (including Northern Beaches, Mosman, North Sydney, Willoughby Councils) [2] **Central** (including Bayside, City of Sydney, Inner West, Randwick, Waverley, Woollahra Councils), and [3] **South** (including only Sutherland Council) (refer

Figure 3). This submission therefore focuses on only the three DPs that make up the SCCG’s area of geographic interest – the North, South and Central Districts.

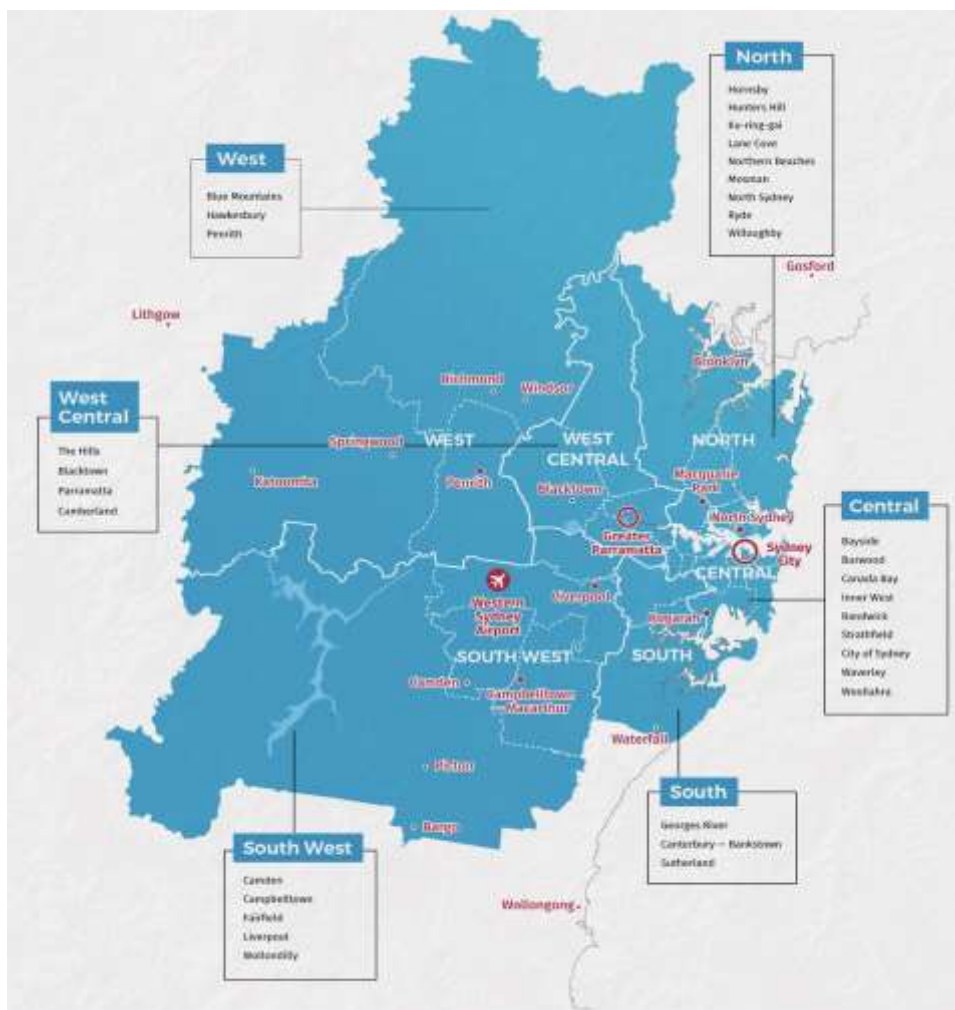


Figure 3 The six Districts (and relevant Councils) that make up the Greater Sydney Region.

² For example, the NSW State Emergency Management Plan 2012 and our project *Emergency Management Planning: A health check for local government* (2014) http://www.sydneycoastalcouncils.com.au/Emergency_Management_Planning_Project .

For these Districts the SCCG makes the following comments that are relevant across all DPs. Further detailed comments on each Priority, Action and Outcome can be found in **Appendix A**. Most comments relate to the Sustainability priorities; however, comments have been made on other priorities where relevant.

GENERAL COMMENTS

- The SCCG is encouraged by the establishment of the Greater Sydney Commission (GSC) to provide better Sydney-wide governance and leadership. However, **implementation, monitoring, reporting and enforcement** of actions are critical to ensuring real progress. This point must be reiterated as many of the issues and priorities raised in these DPs were raised in previous submissions into draft Sydney sub-regional plans and the metropolitan strategy between 2007-2010 (more information [here](#)). **Adequate resourcing, capacity and guidance for local government** is also essential in assisting local government in implementing priorities and actions in the DPs. The SCCG looks forward to assisting the GSC in delivering its vision for the Greater Sydney Region.
- The SCCG formally requests that all issues, concerns, opportunities and recommendations included in this submission are considered and feedback from the GSC is provided via a **publicly available report addressing all submissions**. This is crucial to ensure transparency and evidence-based policy is developed.
- **Concurrent legislative updates** and other policy reforms, including the Biodiversity reforms, must support the vision for the Greater Sydney region. Given the projected growth and the concomitant pressures placed on our coasts, waterways, green spaces, bushland, and biodiversity; Councils and agencies must remain vigilant to ensure Ecologically Sustainable Development (**ESD**) is achieved.
- It is noted that changes proposed in the **Environmental Planning and Assessment Amendment Bill 2017** (also on exhibition) must be read in conjunction with the exhibited draft District Plans for Sydney and the overarching strategy for the Greater Sydney Region. It is hoped that issues raised that are relevant to both will be considered together, and that the GSC and the Department of Planning and Environment (DoPE) will work collaboratively in this regard.

The SCCG has written and submitted a separate submission on the planning legislation updates which can be accessed [here](#).

- The proposed additional layer of **local strategic planning** in the concurrent planning legislative updates, while a step in the right direction, needs to be clearly defined and scoped. Links to, and overlap with Community Strategic Plans (under the *Local Government Act 1993*) need to be explicitly defined so the additional layer does not duplicate or place unnecessary burden on the limited capacity of local government.

PROGRAM LOGIC

- The layout of the plans is difficult to follow, displays 'fuzzy' program (or intervention) logic and will therefore be difficult to both implement and monitor. The flows and linkages between Priority, Action and Outcome should be logical, representing a causal hierarchy that links on the ground activities with desired outcomes for the Greater Sydney Region. As identified in our detailed comments in **Appendix A**, for some priorities (e.g. managing coastal landscapes) there are no actions nor are there any outcomes proposed. Furthermore, actions are 'clustered' under priority headings leaving it unclear as to how exactly a particular action will address a particular priority. As per the NSW Government policymaker's toolkit³ a rigorous program logic should be followed that allows line of sight visibility between project or program activities and intended outcomes. This logic allows for thorough evaluation to assess efficacy, maximise cost effectiveness and is best practice policy development worldwide. **The SCCG recommends that a clear, scalable program (or intervention) logic is developed for each District Plan**, that ultimately allows actions from all agencies and councils to contribute to shared outcomes at a regional level. This would improve the document's readability, its implementability, and transparency.

IMPLEMENTATION PLANS

- It is intended that the proposed **Implementation Plans (IPs)** cover all relevant actions in each District Plan. It is noted that actions will be subject to a business case as they are unfunded and potentially inconsistent with broader NSW Government policy. For each action the implementation plan will identify:
 - the **target outcome** that the action seeks to delivery
 - how the **action** relates to the outcome, and the means to achieving it
 - the **timeframe** for delivery
 - the **measurement** of progress through quantitative KPIs
 - **responsibility** for delivering the outcome, including stakeholder collaboration
 - how **accountability** will be enforced by the Commission or another party
 - how progress will be **reported** to the NSW Government and the public.

The SCCG recognises the critical importance of these implementation plans (e.g. see 2007 submissions on the [East](#) and [North East](#) Sub-Regional Strategies) and has concerns over the lack of clarity around their proposed content, publication, and timetable for consultation. Our own consultation has confirmed that many Councils prefer 'hard' targets upfront as it gives them certainty in communicating their own strategic intent and delivering that through land use planning.

The SCCG recommends that the implementation plans be the subject of further detailed consultation and this process be co-designed with local government. Many of the comments that could be made at this stage of the public exhibition process are relevant to the proposed outline of the IPs. For example, each action and priority will have its own evidence base and be subject to existing programs that support those goals. Identifying specifics at this stage, in lieu of the IPs, would require a significant effort in collaboration between agencies and local government to ensure that robust debate and agreement can occur.

³NSW DPC policymakers toolkit
http://www.dpc.nsw.gov.au/programs_and_services/policy_makers_toolkit/steps_in_managing_an_evaluation_project/1_develop_program_logic_and_review_needs

- Strategic plans by their nature are high level guiding documents. However, the SCCG considers the DPs are too vague and leave too much detail to the proposed IPs that are yet to be developed e.g. targets, KPIs, timeframes, methods, accountability, responsibility and reporting. For example, all of the metrics for key environmental parameters that were developed in the Environmental Advisory Panel paper have been excluded. These metrics should be further developed and agreed on by all parties involved. **The SCCG recommends that the *implementation Plans* (if they are to be carried forward in their current form) be the subject of further detailed consultation.** The GSC should develop a consultation program in coordination with local government.

MEASURING PERFORMANCE

- Sustainability priorities in the DPs require the inclusion of a **high-level target** or Key Performance Indicator (KPI) e.g. minimum air quality and water quality and quantity targets, or open space targets. This would give added weight to sustainability priorities to lift them up to the same level as liveability priorities around housing, which is currently the only area of the DPs that have targets.
- As a key consulting partner in its development along with other peak community, professional and academic organisations, the SCCG strongly supports the ongoing inclusion of outputs from *Environment Panel Advisory Paper for the Greater Sydney Commission* (November 2016). We look forward to seeing further consideration of the Paper's statements and visions, and greater focus on the 15 key environmental issues identified. The Panel also identified a number of potential environmental metrics to assess the performance of the DPs over time. While not finalised, these **quantitative and qualitative metrics should be the subject of further consultation and included in both the final DPs and IPs.**

CROSS BOUNDARY ISSUES

- The DP boundaries align with local government boundaries. Governance issues across boundaries for (example) waterways and waterbodies have hindered the delivery of good environmental outcomes over many years. **Many environmental problems cross arbitrarily drawn council boundaries.** Using catchments, or other ecological or natural system boundaries is considered best practice globally⁴ and is considered a fundamental mechanism to provide the most ecologically sustainable development. The SCCG therefore supports the alignment of the DP boundaries to catchment boundaries. The SCCG is willing to work with the GSC to ensure a more appropriate governance framework is established.
- Substantial coastal waterbodies like Sydney Harbour, Port Hacking, Botany Bay, Georges River, Cooks River, Broken Bay, Hawkesbury Nepean River, and Lane Cove River lie across the boundary of the defined planning Districts and Regions. As key environmental assets for the Sydney region, the management of these waterbodies is a priority as they generate socio-cultural, economic and environmental benefits. Management across boundaries and sectors has been identified as a key barrier to achieving good environmental outcomes⁵ in work completed for the management

⁴ For example, Bioregions are used in marine estate management in NSW, sediment cells form the fundamental basis of the new *Coastal Management Act 2016*.

⁵ MEMA TARA for the Hawkesbury, SCCG CZMP for Sydney Harbour

of the NSW Marine Estate. Effective estuary and catchment management must be enshrined and enabled in the DPs. Ensuring good water quality and quantity outcomes (via an Integrated Water Management approach) would benefit from more useful governance boundaries.

MARINE SPATIAL PLANNING

- The ability to undertake spatial planning within Sydney waterways and offshore in State Waters is an innovation that should be promoted by these DPs. Although some zoning has occurred in Pittwater to provide for coastal and maritime uses, the potential value of implementing **Marine Spatial Planning** in some of this country's most used waterways is enormous. Critically, the multiple values and uses of the NSW Marine Estate have been documented in the Threat and Risk Assessment work undertaken by the Marine Estate Management Authority (MEMA). The Regional and District scale provides the greatest opportunity to become world leading in managing our valuable coastal resources.

WATERWAYS

- **All river systems** across Greater Sydney should be given the same recognition and protection as the Parramatta River. The Hawkesbury Nepean, Lane Cove, Cooks, Georges and Hacking River systems and their blue-green corridors can play a significant role in the liveability and sustainability of Greater Sydney. Each District Plan should have the same priorities to protect and conserve the values of the river systems as well as to enhance access to these rivers for use by the public. The priorities should not be restricted to the Parramatta River.

COASTS

- The SCCG notes that the DPs generally align with objects of **Coastal Management Act 2016**. However, there is scope for strengthening some provisions in relation to coastal landscape protection, addressing all coastal hazards, greater inclusion of estuary and catchment management plans, and links to policy and plans relating to the NSW Marine Estate.
- In 2010, the SCCG produced a [submission](#) on the then *Metropolitan Strategy*. *"The coastal and estuarine environments of Sydney are under increasing pressure to meet the competing conservation, development and recreation objectives of multiple stakeholders. These pressures will only be compounded by increased population and the impacts of climate change."* This statement holds true today, and again highlights the importance of setting clear strategy and implementing it.
- Visitor pressure only adds to the stresses on our fragile coastal environments. Coastal and estuarine environments of Sydney appeal to international tourists and support a huge tourism industry that benefits the entire state. Combined with its beaches the Greater Sydney Region contains National Parks and reserves that are used for conservation as well as recreation and tourism. Our valuable coastal assets are thus being used by both residents and visitors alike, meaning that local governments charged with managing these areas are doing so on behalf of the entire NSW community. It is therefore of fundamental importance that levels of resourcing, guidance and support should be commensurate with this responsibility.

- The scenic values of coastal landscapes should be provided with greater protection in the DPs.

A WATER SENSITIVE CITY

- Working towards a water sensitive Greater Sydney is paramount to achieving the goals of the DPs. **Integrated water management (IWM)** in the urban environment and healthy waterways is integral to;
 - Achieving the goals of a productive, liveable, sustainable and resilient city, and
 - Implementing the Blue-Green Grid.

A Water Sensitive City collects and recycles all sources of water and incorporates a green grid of parks, bushland and other vegetated areas to cool, clean and beautify urban spaces and surrounding landscapes. It empowers communities to make their own decisions about water and creates social connections around urban waterways and water features. The principles of **Water Sensitive Urban Design (WSUD)** should be integrated into all aspects of the DPs and delivered by the IPs.

- The NSW Office of Environment and Heritage (OEH) and the Environment Protection Authority (EPA) have developed a risk-based framework to assist decisions that **maintain, improve or restore water quality** in the strategic planning process to help meet the [NSW Water Quality and River Flow objectives](#). The DPs state that relevant planning authorities and managers of public land *should* adopt the framework as a means of determining appropriate stormwater and wastewater management targets. This should not be optional. For many years, NSW has been seeking a standardised approach to stormwater and wastewater discharges. Adoption of the risk-based framework identifying desired water quality and waterway health in receiving waters and then identifying appropriate discharge limits would be a significant step forward in improving water quality and waterway health across Greater Sydney. The SCCG recommends that the risk-based approach is mandated and key targets set.
- As key mechanisms for managing the water quality of some of our prized assets, **Water Quality Improvement Plans (WQIPs)** should also be recognised and included in the DPs and IPs. For example, in 2011 the (then) Sydney Metropolitan Catchment Management Authority produced the *Botany Bay and Catchment Water Quality Improvement Plan*. The main objective of the Plan was to set targets for pollutant load reductions required to protect the condition of Botany Bay, its estuaries and waterways. This Plan was used to prioritise devolved grants and led to the completion of millions of dollars' worth of WSUD projects within the catchment, as well as the uptake of Development Control Plans and other policies supporting water sensitive city objectives. This Plan is still supported by Greater Sydney Local Land Services and is being used by local councils.

Similarly, in 2015 Greater Sydney Local Land Services coordinated and completed the *Sydney Harbour Catchment Water Quality Improvement Plan*, setting water quality targets to facilitate an improvement in the water quality and ecological integrity of Sydney Harbour and its catchment, and engaging with key land managers and other stakeholders in the project design, process and outcomes. Many of the actions identified in the Sydney Harbour Catchment Water Quality Improvement Plan also involved the use of WSUD techniques in the harbour catchment. The project still provides many benefits to local councils and other stakeholders, including pollutant

and ecological response modelling, information to assist infrastructure contribution costings, and a wide-ranging decision support tool.

- The DPs state that relevant planning authorities and managers of public land should “develop mechanisms to allow offsetting between sub-catchments and facilitate cost effective opportunities to meet management targets for whole catchments”. While the SCCG agrees that water quality targets and management options should be developed and utilised based on whole of catchment integrated water management approach, the allowance of ‘offsetting’ water quality and waterway health between sub-catchments is extremely concerning. Whilst it is understood that water quality targets may differ across sub-catchments due to the nature and value of the waterway and ecosystem, improvements and targets should be set for all sub-catchments to improve waterway health in its entirety, one sub-catchment should not be offset against another.

BIODIVERSITY

- During 2016, the Southern Sydney Regional Organisation of Councils (SSROC) implemented the Connected Corridors for Biodiversity project through the Sydney Coastal Councils Group (SCCG) [‘Salty Communities Program’](#), funded by the Australian Government. The aim of the project was to facilitate increased habitat connectivity, and thereby increase resilience of biodiversity to climate change and other threats; by i) creating a habitat corridor map across 23 local government areas, and ii) developing a guide to the regulatory tools, financial incentives, and other mechanisms used by councils to promote biodiversity conservation on privately owned land. The habitat corridor map and guide are a decision-support tool to assist in prioritising investment in local scale habitat connectivity on both public and private land. The map has been produced as a tool to also prioritise on-ground works and other programs to improve habitat connectivity within a Council LGA or between neighbouring council boundaries. It is noted that the **blue-green grid in its current form lacks detail in terms of its biodiversity and ecological benefits. The SCCG recognises the potential synergies between the blue-green grid and the connected corridors habitat map in further aligning habitat connectivity, and therefore recommends that the connected corridors habitat map be incorporated with the blue-green grid within the District Plans.** It is also recommended that the Greater Sydney Commission utilise the connected corridors habitat mapping endorsed by the SCCG and SSROC and consider extending the reach of the habitat corridor mapping in the future to cover the entire area under the six DPs.

INFRASTRUCTURE

- SCCG recommends that the GSC and DoPE investigate and report back to Government on opportunities to **expand the development contributions system** to allow for its utilisation to enhance open space, environmental assets and contribute to the development of the blue-green grid. Other funding opportunities to assist with public good neighbourhood enhancements must be investigated for utilisation. **Value capture mechanisms** should be implemented when there is land value uplift resulting from up zonings and provision of additional services and infrastructure.
- The DPs identify **Collaboration Areas** in recognition of an area's scale and complexity. These are specific areas where a significant productivity, liveability or sustainability

outcome is achieved via the collaboration of different levels of government, occasionally with the assistance of private sector and landowners. Public open space is limited across Greater Sydney and competition for land use is fierce. The NSW Government and private developers are investing significantly into infrastructure. It makes good economic sense that there is meaningful cross-agency collaboration for every infrastructure project being undertaken on public land. Collaboration in the project planning phase enables limited public open space to be used to achieve multiple outcomes. **Existing and planned corridors for transport, water, wastewater, stormwater, energy and communications should be better utilised to co-locate recreational infrastructure as well as enhancing the blue-green grid.**

HAZARDS

- DPs should provide greater emphasis on **recognising and managing all hazards** across Districts e.g. bushfire, heatwaves, flood, all coastal hazards (as specified in the *Coastal Management Act 2016*) including unnatural hazards.

DETAILED COMMENTS – PRIORITIES, ACTIONS AND OUTCOMES

Comments on specific priorities, actions and outcomes are provided in Appendix A.

APPENDIX A: DETAILED COMMENTS ON PRIORITIES, ACTIONS AND OUTCOMES

Comments below relate to priorities, actions and outcomes across all the North, Central and South DPs. Where comments relate specifically to one of the DPs, this will be annotated (refer Table 1 below and Key).

Table 1 Priorities, actions and outcomes extracted from the North, Central and South DPs aligned side by side with comments.

Key: C = Central, N = North, S = South. Priorities, actions and outcomes are common to North, South and Central DPs except where noted. e.g. C, N, C+N

IMPLEMENTATION ACTIONS COMMON ACROSS ALL DPs		
ACTIONS	OUTCOME	COMMENT
IM1: Align land use planning and infrastructure planning	Inform the NSW Government's infrastructure decision-making	Should include integrated water cycle management i.e. potable water, wastewater, stormwater, and recycled water.
IM2: Develop a framework to monitor growth and change in Greater Sydney	Inform the ongoing actions and infrastructure investments of Government required to deliver <i>A Plan for Growing Sydney</i> and the District Plans	<p>Sydney Water and other energy utilities should be involved at this early planning stage as partners to maximise investment and achieve multiple, mutually beneficial outcomes.</p> <p>Infrastructure funding and delivery. Local government often become the asset owners of stormwater and other “green” infrastructure. Many local governments lack the capacity to maintain this infrastructure on an ongoing basis. While grant programs will fund the <i>construction</i> of stormwater and green infrastructure they often exclude ongoing <i>maintenance</i>. This is a major barrier to not only the construction of new infrastructure but also the performance of this infrastructure to achieve its intended outcomes.</p>
IM3: Develop an interactive information hub – the Greater Sydney Dashboard	Enhance the community's understanding of the performance and	<ul style="list-style-type: none"> ■ Monitoring should also include waterway health ■ Consider benchmarking such as the CRC's 'Water Sensitive Cities Index' https://watersensitivecities.org.au/solutions/water-sensitive-cities-index/ the Index is a tool that offers users the ability to benchmark cities (at the metropolitan or

		characteristics of Greater Sydney	<p>municipal scale), based on performance against a range of urban water indicators that characterise a water sensitive city.</p> <ul style="list-style-type: none"> ■ This will allow organisations to set targets, model the impact of potential management responses, track progress over time, and collaborate more effectively with other industry organisations to manage water in ways that enable vibrant, liveable, productive, resilient, and sustainable urban communities. ■ SCCG recommends that the Greater Sydney Dashboard provides clearly defined targets and key performance indicators for each priority within each DP. For example, metrics can be found in the Environmental Panel Advisory Paper.
A LIVEABLE CITY			
PRIORITY	ACTION	OUTCOME	COMMENT
Facilitate the delivery of safe and healthy places	Provide design led planning to support high quality urban design	Contribute to improved sustainability, productivity and liveability outcomes	It is recommended that design-led planning be built into the planning of all new largescale developments (e.g. Housing estates and urban renewal centres) and that this would incorporate green infrastructure, well connected sustainable/public transport options, renewable energy, and WSUD measures.
Facilitate enhanced walking and cycling connections	No action provided	No outcome provided	<p>This priority is supported by SCCG, particularly regarding linking new sustainable transport connections to the blue-green grid and improving accessibility to the foreshore and coastal areas.</p> <p>Within the DPs this priority needs to link to the blue-green grid and the specific actions to enhance the green grid under the metropolitan green space funding program.</p> <p>Actions and outcomes to support this priority must be developed as part of the further consultation on the Implementation Plans.</p>

Support Planning for Emergency Services	Support planning for emergency services	Contribute to improved decision making for emergency service operators	<p>This priority is supported, although action could be more specific and reference demographic data and projections.</p> <p>The recently launched SCCG's Emergency Management Health Check for Local Government project recognises the need for better urban planning around locational and operational requirements of emergency services with regard to hazards such as inundation, flooding and bushfire zones.</p>
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A SUSTAINABLE CITY

PRIORITY	ACTION	OUTCOME	COMMENT
Supporting 'Enhancing' the ... District in its landscape			Suggest consistent use of the word 'enhancing' as opposed to 'supporting' (<i>supporting</i> is used in Information Note 5).
Protecting the District's waterways Maintain and improve water quality and waterway health	Review criteria for monitoring water quality and waterway health	Improved water quality and waterway health	<ul style="list-style-type: none"> ■ Embed water sensitive city principles in planning controls. DPs must support water sensitive urban design (WSUD) and other water sensitive approaches to manage stormwater to meet the water quality and quantity targets, including harvesting and re-use of water and management of riparian corridors. ■ The SCCG supports catchment-based approaches to management of waterway health and stormwater management standards. ■ A minimum standard of stormwater quality targets and stormwater management practices for new development should be enforced across local government areas. ■ Public land should be retrofitted with stormwater management systems to reduce pollution discharged to waterways and increase greening and urban amenity. ■ Sydney Water's operating license should be amended

			<p>to reduce sewage overflows and minimise pollution entering waterways.</p> <ul style="list-style-type: none"> ■ Greater emphasis on stormwater harvesting and wastewater recycling is required to ensure pollution discharged to waterways is minimised. <p>Both the SCCG and the SPLASH network request the addition of a new case study: 'Delivering water sensitive growth in an urban renewal area'. Insert the following text in relevant DP:</p> <p>"With predicted population growth and climate change, there will be enormous pressure on existing water and wastewater infrastructure requiring future investment in augmentation of centralised systems. Increased water demand should be met by alternative water supplies including recycled wastewater. Recycled water should be used for non-potable uses including toilets, laundry, cooling and irrigation.</p> <p>Recycled wastewater preserves potable water resources and provides a climate resilient water supply creating better water security. It also maintains green space and enhances city greening and urban cooling.</p> <p>Urban renewal areas in every District should include recycled water schemes. Urban renewal areas present the best opportunity to incorporate recycled water infrastructure which can be planned and delivered during redevelopment. This is more cost effective than retrofitting. Urban renewal areas also provide the density and scale for efficient investment in water recycling infrastructure."</p> <p>Through the CRC for water sensitive cities www.watersensitivecities.org.au and work that has been undertaken by other agencies and councils across NSW, lessons can be shared to assist with successful implementation. Focus should consider support to see urban design and integrated water cycle management inclusive of water sensitive urban design implemented rather than investigated. There is a knowledge gap across</p>
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			<p>most councils and industry to ensure effective implementation of integrated water cycle management, a gap that needs to be addressed.</p> <p>All river systems across Greater Sydney should be given the same recognition as the Parramatta River and Sydney Harbour. The Hawkesbury Nepean, Cooks, Hacking and Georges River systems and their blue-green corridors can play a significant role in the liveability and sustainability of Greater Sydney. Each District Plan should have the same priorities to protect and conserve the values of the river systems as well as to enhance access to these rivers for use by the public.</p>
<ul style="list-style-type: none"> ■ Protect and conserve the values of Sydney Harbour (C+N) ■ Enhance access to Sydney Harbour foreshore and waterways (C+N) 			<p>Actions and outcomes to support this priority must be developed as part of the further consultation on the Implementation Plans.</p>
<p>Managing coastal landscapes</p>			<p>Actions and outcomes to support this priority must be developed as part of the further consultation on the Implementation Plans.</p>
<p>Protecting and enhancing biodiversity</p> <ul style="list-style-type: none"> ■ Avoid and minimise impacts on biodiversity 	<p>Update information on areas of high environmental value</p>	<p>Protection and management of areas of high environmental value</p>	<p>The SCCG agree that avoiding and minimising impacts should most definitely be considered before offsetting, at both a strategic and local scale. However, this priority should be rephrased in more positive language e.g. '<i>actively protect, enhance and restore biodiversity</i>'.</p> <p>SCCG does not support offsetting as a method of protecting biodiversity¹. Particularly, given the SCCG's concerns about the reduction in biodiversity protection under the Biodiversity reforms, including the proposed changes to the offset scheme.</p>

¹ SCCG submission to the NSW Biodiversity Conservation Legislation Reforms 2016
http://www.sydneycoastalcouncils.com.au/sites/default/files/SCCG_Submission_NSW_Biodiversity_Law_Review_2016_036-16.pdf

<p>Delivering Sydney's Green Grid</p> <ul style="list-style-type: none"> Align strategic planning to the vision for the Green Grid 	<p>Use funding programs to deliver the ... District Green Grid priorities</p>	<p>Delivery of the Green Grid priorities</p>	<ul style="list-style-type: none"> Should be re-worded to specifically recognise 'Blue-Green Grid' <p>Funding programs: Both the SCCG and the SPLASH network believe that consideration needs to be given to the length of time grants are offered. Short-term grants i.e. 1- 2 years which is quite typical of state government is challenging to work with from a Council perspective, particularly when match funding is required. Council approvals and processes can be lengthy at times particularly as most council budgets are set well in advance.</p> <p>In order for programs such as the Metropolitan Greenspace program, Environmental Trust grant program and Sydney's Walking Future and Sydney's Cycling Future program to be successful and part funding be expected from its council partners, long-term grants i.e. 3-5 year and longer are necessary for successful implementation and effective change across our cities.</p> <p>Sydney's green grid of parks and open space should be maintained using vegetated stormwater management systems that provide passive irrigation and/or recycled water. This will conserve potable water while enhancing city greening, cooling and liveability.</p> <p>The <i>Living Waterways Framework</i> developed by Healthy Waterways in Queensland has been developed to support implementation of water sensitive urban design by encouraging and incentivising design solutions that embody all the elements of liveability, resilience, sustainability and productivity.</p> <p>The approach is site-driven and aligns traditional stormwater principles with place-making benefits. A scoring system encourages innovation and improved design outcomes, while being flexible enough to cater for a variety of development types within the community.</p> <p>It is recommended by the SCCG and SPLASH Network that the GSC consider the adoption of this Framework to</p>
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			embed as a support tool and methodology for designing innovation and multi-functional spaces across Greater Sydney.
	Develop support tools and methodologies for local open space planning	Improved utilisation of open space and increased provision of open space	Open space/green space is essential for mental health and wellbeing, and will become increasingly important with continued population growth and urban intensification resulting in pressures on land use/zoning. SCCG supports better planning around the provision of open space in the future, and also supports linkages between open space, the blue-green grid and the SSRoC/SCCG Connected Corridors for Biodiversity habitat areas.
	Identify opportunities for shared golf courses and open space (C).	Maximise benefits to the public from the innovative use of golf courses (C)	SCCG support the use of golf courses as passive and active recreational areas and open space.
■ Protect, enhance and extend the urban canopy	Update the Urban Green Cover in NSW Technical Guidelines to respond to solar access to roofs	Protection of solar access to roofs	The SCCG support the Priorities to enhance the urban tree canopy and mitigate urban heat island effect. This links well with the Connected Corridors for Biodiversity Project ² . Consideration should be given as to how these priorities will link with upcoming Biodiversity reforms and the proposed Vegetation SEPP.
■ Improve protection of ridgelines and scenic areas			Actions and outcomes to support this priority must be developed as part of the further consultation on the Implementation Plans.

² Connected Corridors for Biodiversity Project (SSRoC, 2016)

<http://www.sydneycoastalcouncils.com.au/sites/default/files/Connected%20Corridors%20for%20Biodiversity%20Guide%20to%20biodiversity%20conservation%20on%20private%20property.pdf>

<p>Managing the Metropolitan Rural Area (S+N)</p> <ul style="list-style-type: none"> ■ Discourage urban development in the Metropolitan Rural Area (S+N) ■ Consider environmental, social and economic values when planning for the Metropolitan Rural Area (S+N) ■ Provide for rural residential development while protecting the values of the Metropolitan Rural Area (S+N) 			<p>Actions and outcomes to support this priority must be developed as part of the further consultation on the Implementation Plans (e.g. considering important agricultural food lands/market gardens).</p>
<p>Creating an efficient North District</p> <ul style="list-style-type: none"> ■ Support opportunities for District waste management 	<p>Identify land for future waste reuse and recycling Embed the NSW Climate Change Policy Framework into local planning decisions</p>	<p>Identification of land for waste management Contribute to energy efficiency, reduced emissions and improved environmental performance</p>	<p>SCCG supports the 'Waste to energy approach' to waste management, and consideration should be given to planning for further waste to energy opportunities.</p>
	<p>Support the development of initiatives for a sustainable low carbon future</p> <p>Support the development of environmental</p>	<p>Contribute to energy efficiency, reduced emissions and improved environmental performance</p> <p>Contribute to improved environmental</p>	<p>SCCG supports the development of targets and benchmarks for environmental performance. These should be included in the implementation plans and be recorded and monitored via the 'Dashboard'.</p>

	performance targets and benchmarks	performance	
Planning for a resilient ... District			A Water Sensitive City can help to adapt and build resilience for climate change. The synergies between climate change and water sensitive cities are significant and it makes good economic sense to start to align efforts in these areas. The creation of the blue-green grid should be given priority as a means of mitigating the urban heat island effect in urban renewal projects and priority growth areas.
<ul style="list-style-type: none"> ■ Mitigate the urban heat island effect 	Incorporate the mitigation of the urban heat island effect into planning for urban renewal projects and Priority Growth Areas	Contribute to reductions in ambient temperatures	
<ul style="list-style-type: none"> ■ Integrate land use and transport planning to consider emergency evacuation needs ■ Use buffers to manage the impacts of rural activities on noise, odour and air quality (S+N) ■ Assist local communities develop a coordinated understanding of natural hazards and responses that reduce risk 			Actions and outcomes to support this priority must be developed as part of the further consultation on the Implementation Plans.
	Review the guidelines for air quality and noise measures for development near rail corridors and busy roads	Improved land use and transport decision making	A review of air quality and noise guidelines for developments on busy corridors is supported. SCCG supports rigorous and transparent environment assessment procedures for all developments to minimise impacts on the environment and residents.