



Friday, 28 October 2022

## Re: Comments on the Six Cities Region Discussion Paper

Dear Greater Cities Commission,

Thank you for the opportunity to make a submission on [The Six Cities Region Discussion Paper](#), currently on public exhibition.

### Strategic Alignment

The Sydney Coastal Councils Group (SCCG) is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders. We are guided by the SCCG's 2019-2029 Strategic Plan which includes six goals, four of which are highly relevant to the draft Guidelines:

- People and places adapt to a changing climate and future shocks and stressors
- Waterways and the foreshore are protected and healthier
- The SCCG Region is comprised of sustainable, livable and 'smart' cities
- There is a collaborative, effective and consistent approach to coastal and estuarine management

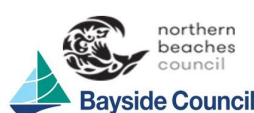
The SCCG, in partnership with the Parramatta River Catchment Group, is also developing the [Greater Sydney Harbour Coastal Management Program](#). The vision for the CMP is to improve and sustain waterway health through improved coordination, consistency and leadership. It involves 20 Councils in the Greater Sydney Harbour catchment along with a key NSW agencies and research institutions.

The Six Cities Discussion Paper is a starting point for NSW Government's plan to build Australia's only truly global city region: Lower Hunter and Greater Newcastle City, Central Coast City, Illawarra-Shoalhaven City, Western Parkland City, Central River City and Eastern Harbour City. It is intended to connect and create more liveable cities across NSW.

### Our Comments

#### Give context to the environment in the vision for delivering local liveability

The vision focuses on economic and social aspects of liveability but also needs to cover environmental aspects of liveability, including healthy ecosystems which provide clean air and water and are biodiverse. The concept of resilience to climate-related risks also needs to give context to the role of healthy ecosystems for climate resilience.



### Retain key objectives from the Metropolis of Three Cities

The Six Cities Region Discussion paper builds on the 2018 Greater Sydney Region Plan 'Metropolis of Three Cities' with the aim to create a new regional plan by 2023 encompassing six cities, each with their own city plans. The SCCG strongly recommends that some of the objectives from the Metropolis of Three Cities are adopted, given their importance to the management of our coasts and estuaries.

In particular:

- *Objective 25 – Coast and Waterways are protected and healthier*
- *Objective 30- Urban Tree Canopy Cover is increased*
- *Objective 36 – People and places adapt to climate change and future shocks and stressors*

### A greater focus is needed to reflect the importance of our coasts and estuaries

The Greater Sydney Harbour waterway and catchment extends across the Eastern Harbour City and Central River City, with these city plans to be developed by the end of 2023. Hence it is important to include coastal and estuary management within these city plans.

In addition, given that the majority of the six cities are coastal cities (see Figure 1), we suggest that the Discussion Paper acknowledges the need for continued support for coastal and estuary management through the NSW [Coastal management framework](#) and the [Marine estate management strategy](#).

### Six Region Shapers

A connected Six Cities Region should encompass connectedness for the environment, as well economic and social connections and recognise that environmental management goes beyond the boundaries of an individual city. This applies to both air, water and biodiversity which all need to be managed from a regional perspective.

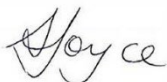
### Specific comments on Priority 6

Priority 6, *Climate-resilient green cities*, is the priority most relevant to the objectives of the SCCG. Table 1 following, captures our comments and recommendations in relation to this priority and other sections of the Discussion Paper.

I trust that the feedback provided will be helpful in shaping your thoughts on how to improve priorities so that they best reflect the vision of communities and partners in the regions.

If you have any queries, please contact me on 0407 733 075 or by email at [executiveofficer@sydneycoastalcouncils.com.au](mailto:executiveofficer@sydneycoastalcouncils.com.au)

Yours sincerely,



Sarah Penny Joyce  
**Executive Officer**



Sutherland Shire  
COUNCIL



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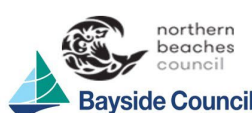


Randwick City Council  
a sense of community



**Table 1 – Comments on the Six Cities Region Discussion Paper**

Discussion Paper Reference	Comments
Priority 6 – Resilient Cities	
<p>6.5 The Region and City Plans will take learnings from recent events and be informed by integrated data, including the priority actions set out in the NSW Climate Change Adaptation Strategy and the 2022 NSW Floods Inquiry, to reflect and respond to exposure and vulnerability to climate-related risks, particularly urban heat, bushfire, and flooding.</p>	<p>Climate-resilient green cities acknowledges the risks of bushfires, flooding and urban heat but not coastal hazards or sea level rise.</p> <p>Acknowledging coastal hazards and sea level rise is also important in effectively managing coastal erosion which is identified in the 20-year vision for priority six, <i>“We are actively and effectively managing climate vulnerability, proactive climate proofing, urban heat and planning, and designing our built environments to withstand flooding, bushfires and coastal erosion”</i>.</p> <p><b>Recommendations:</b></p> <p>Sea level rise should be acknowledged as a specific threat particularly for the open coast and for low relief low-lying foreshore areas around Sydney.</p>
<p>6.6 The City Plans will develop tree canopy investment strategies and set place-based targets for canopy cover.</p>	<p>The City Plans support investment in green infrastructure such as urban tree canopy targets, water in the landscape and recycled water. It is important to recognise that water recycling by itself is not going to mitigate urban heat but rather how the water is used within the landscape.</p> <p>Greater investment in green infrastructure also needs to be directed to waterway health, increasing riparian vegetation corridors, not just increasing urban tree canopy. This includes acknowledging the need to connect bushland and waterways as part of healthy ecosystems.</p> <p><b>Recommendations:</b></p> <p>City Plans also need to include stormwater management undertaken within a broader catchment management and Integrated Urban Water Management (IUWM) approach. Green infrastructure investment should consider waterway health outcomes.</p>
<p>6.7 The Region and City Plans will reflect the NSW Water Strategy and consider recycled water infrastructure.</p>	<p><b>Recommendations:</b></p> <p>Regional and city plans should consider the <a href="#">Greater Sydney Water Strategy</a> not just the NSW Water Strategy which encompasses the whole state.</p>
Priority 6 – Sustainable homes and buildings	
<p>6.8 The Region Plan will include actions needed to strengthen resilience to urban heat, including updates to urban design guidelines, planning and building.</p> <p>6.9 The Region Plan will set targets for low embodied emissions in construction materials and support more climate-resilient, energy and water efficient infrastructure and buildings, including updated BASIX standards.</p>	<p><b>Recommendations:</b></p> <p>Sustainable homes and buildings should also consider siting and property modification measures to protect against fluvial flooding and coastal inundation, both in the present and in the future against climate change impacts including predicted sea level rise.</p> <p>The Region Plan should also consider how the planning for and installation of green infrastructure will help transition each region city toward becoming a water sensitive city.</p>
Bringing together six cities – the next steps: Governance for delivery	



Discussion Paper Reference	Comments
<p>Existing Joint Organisation of Councils or Regional Organisations of Councils may provide appropriate forums which can be incorporated into the governance structure. These bodies vary in their form and function and the Commission will work with local government to obtain their views on the right model for each city.</p>	<p>Existing Joint Organisation of Councils (JOs) or Regional Organisations of Councils (ROCs) can assist with governance for delivery of city plans.</p> <p><b>Recommendations:</b></p> <p>The Commission should acknowledge the need to collaborate with and support the work of existing ROCs specifically the SCCG and Parramatta River Catchment Group, as well as other important catchment organisations including the Cooks River Alliance and Georges Riverkeeper.</p>



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