



attachment 1
to
item 229

Summary of Key Issues to include in
submission to Greater Sydney
Commission regarding the Draft
Greater Sydney Region Plan and the
Draft Western City District Plan

date of meeting: 12 December 2017

location: council chambers

time: 6:30 p.m.

Hawkesbury City Council Submission on the Draft Western City District Plan of the

Greater Sydney Commission, December 2017

Executive Summary

- Hawkesbury City Council appreciates the work of the Greater Sydney Commission (GSC) through its draft District Plans and for the collaborative approach in engaging with Council as we work through the issues raised in relation to the Draft Western City District Plan. Council looks forward to playing its role in this planning process and to supporting the implementation of the Western City District Plan.
- Hawkesbury City Council applauds the Greater Sydney Commission on the level of engagement with stakeholders in the development of the Draft Greater Sydney Regional Plan (the draft plan). HCC is grateful to be a part of the peak agency consultative process and acknowledge the Commissions take up of issues previously raised by HCC as part of the West District Plan process and submission and a number of Peri Urban issues in the draft document. However, it is considered more can be included in the plan to fully reflect the issues relevant to the Hawkesbury.
- Central to the success of the Western District Plan will be the delivery of a Regional Infrastructure Plan and Transport Linkages Plan with a range of 'game changing' actions based on the 3 principles of Productivity, Liveability, and Sustainability.
- For the Hawkesbury this would include extending the North-South Rail Link through the District and linking Penrith with the existing rail within the Hawkesbury (Richmond Line) and linking the North West Metro with the Richmond Line.
- Transport Planning, as the draft West District Plan has correctly assessed, is the key to unlocking local jobs, housing choice and other economic opportunities for our communities. For the Hawkesbury this would mean an Outer Western Sydney Orbital Road Linking with additional flood free crossings of the Hawkesbury River to the west. The need to improve public transport links from Penrith to the Hawkesbury has come up consistently as a high priority as part of Council's community engagement processes.
- For Productivity in our district a Local Employment Strategy would assist in identifying key employment industries and opportunities to strengthen these industries in the Hawkesbury. These include agricultural uses and food security for greater Sydney, the growing equine industry, and the provision of guidance for rezoning of employment lands and the availability of industrial zoned land to support the workforce is a matter that could be considered further.
- The future role of the RAAF Base at Richmond will be crucial to the future productivity of the district including contingency planning if the Base was to close, and exploring joint use of the facility to compliment the Western Sydney Airport including charter and commercial operations, as well as STEM industry opportunities for 'high end' jobs and other uses that would support the district.
- For Liveability in our district a 'Whole of Community' approach with a 'Village' Lifestyle and Liveability Model focused on local services and employment is considered appropriate. It is also recommended that a "Whole of Health" approach across the District from preventative health to acute care, and a Community Services Strategy with State and regional agencies including a Social Infrastructure and Investment Plan across the District be undertaken.
- A Housing Strategy across the district with local area plans will be key to housing diversity, affordable and sustainable housing outcomes, and affordable rental housing targets specific to the population demographics of each local government area. This will

be essential to develop strategies that reverse the growing income inequities and intergenerational inequity (more here?) that has developed over the last three decades between East/North-East Sydney and Greater West/South West Sydney.

- For Sustainability in our district the Plan needs to recognise the significant heritage of the Hawkesbury, protect its National and State Parks which have considerable ecological significance, and its rivers, waterways and wetlands.
- Crucial to sustainability will be State Government and regional planning to support Hawkesbury's role in providing essential green space for growing Sydney including Hawkesbury's recreational spaces. Funding to improve and manage increased river use, and improved connection for cycle-paths, and road and recreational trails identified between the Hawkesbury and North West Growth Sector of Sydney is also viewed as essential.
- Recognise the increased focus on the South Creek catchment, however, in focusing on the South Creek catchment, the larger and more significant catchment of the Hawkesbury Nepean has been largely overlooked and needs to feature more prominently in terms of highlighting the issues and opportunities associated with the catchment.

Hawkesbury Community Engagement

Hawkesbury City Council has undertaken extensive community engagement, both for Council's Service Level Reviews in 2016, and more recently, through a Community Engagement Strategy (CES) for the development of the Hawkesbury Community Strategic Plan (CSP) 2017-2036, adopted by Council in March 2017.

The main aim of the CES was to verify with the community their aspirations for the future, their priorities, challenges/considerations for our future, and whether or not the directions and strategies contained within the Draft Hawkesbury CSP were an appropriate response.

The CES engaged 350 people across 9 'Town Meeting' locations and received over 250 Big Picture Challenges and over 400 Individual Priorities for works or services. Over 2,100 hardcopies of the draft CSP were distributed across shopping centre 'Listening Kiosks' and other engagement events. Priorities were received via Vox Pop's at three youth events. Submissions were also received by an Online Survey through a CSP site on Council's *Your Hawkesbury Your Say* online portal which had an average of 30 views per day across the seven week engagement period.

Big Picture Challenges

As part of the CES across the Hawkesbury we asked participants to undertake a Big Picture Challenge which asked residents to provide feedback in terms of the biggest challenges facing the Hawkesbury and its future. We received over 250 Big Picture Challenges from the community, and relevant to the Western City District Plan, the types of issues that were consistently raised by the whole community included:

- need to improve transport systems
- need for additional flood free bridge crossings
- improve quality of rivers and waterways
- balancing growth and addressing traffic congestion in the Hawkesbury
- increase opportunities for tourism
- increase opportunities for youth (employment, activities and engagement)
- need to improve waste services
- need for planned infrastructure
- improve access to and facilities at parks and reserves.

The adopted Hawkesbury Community Strategic Plan was updated to reflect the key points raised through the engagement process being reflective of the input from the community.

Summary of Draft Submission Points Under Headings of Productivity, Liveability and Sustainability

Productivity

Input into District Planning Process and Future Transport 2056 Input

As part of consideration of the Draft West District Plan as it was at the time, Council raised the following points that are relevant to consideration of the Future Transport 2056 suite of documents.

A Regional Infrastructure Plan and Transport Linkages Plan could consider a range of 'game changing' plans based on the 3 principles of Productivity, Livability, and Sustainability, including:

- Extending the North-South Rail Link through the District and linking Penrith with the existing rail within the Hawkesbury (Richmond Line)
- Linking the North West Metro with the Richmond Line
- Outer Western Sydney Orbital Road Link with additional flood free crossings of the Hawkesbury River to the west and Bells Line of Road.
- Improve public transport links between the Hawkesbury and Penrith.
- Focus on providing infrastructure for residents, not visitors and industry perceptions, including parking around public transport hubs.
- Plan to include an Implementation Strategy.

Further input into the ongoing District Planning process (now a combination of the previous West and South West Districts) has relevantly included:

- Support for the new third city in the metropolitan plan and underpinning the recently released draft District Plan.
- The potential for a future Richmond Investigation / Collaboration / Business Incubation Precinct that provides opportunities for:
 - Education
 - Research
 - Aerospace
 - Food / Agriculture
 - Equine
- Supporting- complementary land uses around the agglomeration of education and defence uses in Richmond and to the adjoining townships of Richmond and Windsor.
- Support for Masterplanning processes for Richmond and Windsor that encourage new lifestyle and entertainment uses, employment opportunities, activates streets and places, grows the tourism economy and respects and enhances the significant heritage value and assets.
- Facilitating the attraction of office/commercial floor space and provide opportunities to allow commercial and retail activities to innovate, including smart work hubs
- Recognising the Importance of access to tourism and recreational opportunities offered in the Hawkesbury

Input Into City Deal

Hawkesbury City Council is one of eight Councils participating in the "City Deal" project with Commonwealth and State Government representatives.

The draft Region and District Plan along with the Future Transport strategy needs to have regard to all of these matters.

To date the primary objectives of the City Deal discussions have related to:

- Linking future transport and landuse considerations, so as to ensure that future employment and community service opportunities are located in close proximity to associated housing, recreation and leisure opportunities
- Considering transport as combination of public transport, active transport and road transport
- Moving towards a 30 minute city in terms of the travel times between the various employment, community service, housing, recreation and leisure opportunities
- Establishing a north-south public transport network that:
 - links Rouse Hill to Campbelltown
 - Provides for a passenger interchange where the north-south link crosses the Richmond line
 - links key centres including Penrith, Liverpool, Campbelltown and the Badgerys Creek Airport
 - linking land development to infrastructure delivery to avoid the creation of new suburbs isolated from transport and services
 - addressing flooding issues including the need for a third all conditions crossing of the Hawkesbury
 - The need for far greater certainty in terms of location and timing, in relation to critical transport corridors such as north-south road, the outer orbital and the Castlereagh Freeway linking the M7 to Bells Line of Road.

The draft Region and District Plan, along with the Future Transport strategy needs to have regard to all of these matters and as such these points all need to be included in the response to the Draft Region and District Plan, and Draft Future Transport 2056 suite of documents.

Peri Urban Productivity

- The draft plans recognition of the rural regional landscape, its attractiveness and functionality is also applauded. It is commendable the draft plan supports values such as biodiversity, rural production, scenic amenity, landscape heritage, tourism, open space and outdoor recreation.
- Despite this, there is a significant and ongoing loss of productive land, biodiversity and habitat in the metropolitan rural areas and this has happened over the life of previous metropolitan planning instruments and is evident on the ground. Therefore the draft plan would benefit in further in terms of detail regarding measures and monitoring the draft plans implementation on the ground.
- Primary producers become isolated when neighbouring plots of land are bought by land-bankers with no intention of, or incentive to, work the land. The inability of the planning framework to “quarantine” lands from speculation is a critical issue and urban imperatives, rather than food production ones, drive the discourse in the planning documents.
- Many Peri Urban Councils have been actively participating in Sydney’s 100 Resilient Cities Project and it is pleasing to see that the draft plan acknowledges the 100RC Project and the importance of the concept of urban resilience.

Recognition of agricultural precincts

- Page 120 - Rural lands play an important role by providing diverse habitat, contributing to air, water and landscape quality, providing locally grown food for the Sydney Basin and serving as a carbon sink for greenhouse gases. It is applauded that this has been recognised in the draft plan. The recognition of rural industries, agriculture and associated resources is also commended and could be strengthened further by the recognition of agricultural precincts.
- There is an opportunity to enhance the Metropolitan Rural Area (MRA) through the recognition of specific rural precincts that are developed or have the potential to be developed. The draft plan is silent regarding government supporting or nurturing precincts, yet they emerge in and of themselves.
- It is crucial the draft plan considers a new approach to how Peri Urban areas are valued based on new agribusiness and tourism opportunities that pulls multiple uses and values together. It is pleasing to see the draft plan touch on this issue but could be strengthened to include new models involving clusters, cooperatives and regional innovation systems that are linked to changing lifestyle values. This could include new forms of agriculture niche products and industries, smaller land footprints, extremely short value market chains and eco-tourism opportunities. These solutions are not usually well accommodated by existing land use planning mechanisms, which severely restrict the creation of small lots, often constraints on farm sales activities, and are designed around an enterprise model that sees all business activity take place on one site. Transformation in eco-tourism opportunities and agriculture continues to be threatened by increasing land prices and related demand from urban developers. These issues need to be considered in policy development context.

Multiple mechanisms to protect and support activities in the Peri Urban Areas

- The preservation of agricultural and environmental land on the fringe is an important issue for the future planning of the Greater Sydney Region and its fresh food and produce supply. Historically when land has been zoned for agriculture and rural land uses there has been limited economic incentive to work and maintain land near Sydney. The current pressure on farmers and landholders within the Sydney basin – particularly in areas of the Hawkesbury, Wollondilly, west of Penrith and Liverpool – are the same as those in the rest of the city; land prices are high and land-banking issues have attributed to this. A clear planning framework is essential to preventing this. Current practices of land speculation and land-banking in fringe areas have already displaced productive agriculture by driving up land values and has the potential to create an artificial distortion of the market.
- There is a historical pattern of farmers regularly relocating to avoid urban development in the Greater Sydney Basin. At the core of this is the problem urban growth and productive agriculture traditionally have shared similar imperatives in their search for land. Too often, land in the Peri Urban space is seen as remnant or surplus. The overwhelming imperative of housing in the draft plan, and draft district plans, dominates considerations of land use. Premium price in the Peri Urban space today reflects residential-subdivision potential rather than tourism and agricultural potential.
- Primary Producers need viable commercial conditions such as land security and a return for the public good they provide to operate in the Greater Sydney Basin. Limited mechanisms are used to value the Peri Urban space and the draft plan is grounded in land use planning mechanisms, focused on urban growth boundaries and green spaces, and planning scheme controls on the development of rural land. A broader policy development approach should be used that is cognisant of the interrelationship between agriculture, food security and urban encroachment

- Page 139 – Whilst the approach of restricting urban development in the MRA is applauded, it is unlikely to protect the intention of the MRA – the actual effectiveness of restricting urban development in the MRA is a similar concept to zoning land for specific uses. The use of zoning as an agricultural and environmental lands protection tool in the past has proven ineffective and has rarely been evaluated.
- There has been a retreat from production-linked support, such as subsidies and incentives, towards attempts to contribute to resolving the challenges faced by primary producers and agribusiness initiatives and have concentrated solely on the economic and social revitalisation of rural areas. To encourage viability of agricultural production a variety of mechanisms such as continuing incentives for rural producers to remain in the Greater Sydney area. It is to the economic and cultural benefit of Greater Sydney to have viable food production within its boundaries. The need for sustainable food sources close to Sydney is important for future food security, particularly against a context of global warming, increased aridity in western NSW, and increasing food transport costs (“food miles”).
- Market mechanisms such as Agricultural Credit Schemes and Transferable development rights reward both developers and farmers: developers, by purchasing development rights, gaining the ability to build at higher density; farmers receive financial incentives not to subdivide land and to make the land productive. Development rights are not attached to land titles and the legal aspects of these schemes are complex. These mechanisms are worthy to explore and require further refinement before they could be introduced. It is recommended that further policy development be focused on this issue.
- Development rights can also be used to facilitate land preservation for agricultural or environmental reasons. In this approach, landowners voluntarily sell the rights to develop their land to a government or non-government organisation, such as a private land trust, after which a permanent covenant is placed on the land preventing its future development. In the case of agricultural land, this ensures that it is retained as farmland or open space. Whilst generally reducing the market value of the land, because it no longer has development potential, this effectively allows a farmer to raise capital by cashing in part of their equity. This has a positive effect on the land's ongoing agricultural use and makes it more affordable for other farmers to purchase. The system is extensively used throughout the USA, preserving 728,500 hectares, expending approximately \$4 billion on purchase of development rights programs.
- Land-banking has the potential to sterilise the productive use of the land where as the use of the land by primary producer's addresses liveability, resilience, productivity issues and employment. The Sydney Basin Farmer is becoming a “threatened species” due to viability issues, of which land-banking has also attributed to. A clear planning framework and the use of innovative incentives and creative social policy development is essential to preventing land-banking and speculation. The draft plan and the draft district plans are silent regarding the public good that is being provided by primary producers through the provision of rural views, vistas and cultural landscapes who in return receive little compensation or acknowledgment for the provision and management of the MRA. The same value placed on the protection and enhancement of the green grid should be placed upon the MRA through innovative social and economic policy development, (i.e. Agricultural Enterprise credit scheme and pilot MRA land management schemes etc.) This and other types of innovative solutions should be developed to ensure the ongoing viability of agricultural retention and rural lands in the Sydney basin

- Page 121- The draft plan seeks to support and protect agricultural production and mineral resources and states this will be achieved through the Department of Primary Industry's Agriculture Industry Action Plan and International Engagement Strategy. The initiatives in the action plan provide the direction for government and industry to work together to accelerate growth in NSW agribusiness. The Department of Primary Industry's Agriculture Industry Action Plan GOAL 3: ENABLING COMPETITIVE ADVANTAGE. Recommendation 7 seeks Government to adopt an approach to policy development that actively addresses market and government failures that constrain profitability and productivity or impede sustainability of the industry. Land speculation and Land-banking are issues that have the potential to constrain profitability, productivity and impedes upon the sustainability of the agricultural industry in the Greater Sydney Basin. Urban imperatives, rather than food production ones, drive the discourse in the Greater Sydney Commission planning documents.
- Productive land-valuation processes are often conducted by valuers with urban education and experience; this results in the potential for the particular nuances and assets of fringe and rural lands to be overlooked in valuation processes. There has been a recognition that rural valuation is a neglected area of the profession and would require more thought. Intangible multifunctional values, such as open space, amenity and ecosystem services, must become a more entrenched part of the valuation layer. Perhaps one way of doing this is to start to think about how to put a market around these things in the Peri Urban space. This issue should be acknowledged for further exploration in both the draft plan and draft district plans.

Access to Jobs

- Transport Planning, as the draft plan has correctly assessed, is the key to unlocking local jobs, housing choice and other economic opportunities. Journey to Work data from the Census shows a pattern of regional travel along a North-South axis yet historical transport infrastructure and planning for the Hawkesbury is largely City centric (East-West) or not at all (i.e. no North to South planning to link with Penrith). Need to improve access to jobs through public transport links from Penrith to the Hawkesbury.
- Need to develop a Local Employment Strategy within a regional planning framework for the whole district.
- Include a local centre hierarchy in the plan
- Absence of clear guidance for rezoning of employment lands and the availability of industrial zoned land to support workforce.
- Need for recognition of growing equine industry in the Hawkesbury
- More focus on the significance of agriculture to the District and Sydney (food security) particularly given loss of agricultural land in South West Sydney
- Investigate opportunities for food production and processing park (possibly associated with WSU).
- Need for a Rural Lands Strategy including managing agriculture and the river systems (water sharing plan). Recognise the need for a Rural Lands Strategy including managing agriculture and the river systems (water sharing plan), and investigate opportunities for food production and processing park.

Role of RAAF Base Richmond

- Recognise the opportunities for joint use of RAAF base (charter and commercial operations)

- The Plan should reflect the role of the RAAF Base in terms of the economic vitality of area, and considerable and long lasting impacts if the Base were to close.
- Contingency plans in the case of closure need to be considered, in addition to the potential for the Base to play a role in connections with the future Western Sydney Airport.
- Potential for STEM industry enhancements connected to RAAF (i.e. Science Park, Space Camp, and links with the Western Sydney Aerotropolis) will result in more 'high end' jobs for the District.
- Include in the Plan future uses of the Richmond RAAF Base in connection with the future Western Sydney Airport such as STEM industry uses which would result in more 'high end' jobs for the District.
- Other options for future consideration includes a Food Production Park/Agri-businesses opportunities based on agricultural produce (potentially niche market produce) from the area that can be readily transported and ensure fresh food security in the district.
- The Plan acknowledge other future uses such as Food Production Park/Agri-businesses opportunities based on fresh agricultural produce and district food security.

Floodplain Management on a District Level

- Need for a District approach to planning to address flooding issues in the Hawkesbury - Nepean Valley, including implementation of the Hawkesbury-Nepean Flood Risk Management Strategy 2017 to appropriately respond to flood risk and inform growth strategies.
- District approach to flooding issues in the Hawkesbury Nepean should ensure consistency of outcome through way of policy, standards and assessment.
- A District approach to flooding issues should be supported to ensure consistency of outcome through policy, standards and assessment.

Liveability

A 'Whole of Health' Approach

- There is a need to implement a 'Whole of Health' approach across the Hawkesbury communities from preventative health to acute care including active living programs, mobility, including pedestrian and cycling facilities, and a greater focus on improving health outcomes in Aboriginal Health, Youth Health, Women's Health, Mental Health, Sexual Health, and through domestic and family violence prevention strategies.
- Need to improve public transport links from Penrith to the Hawkesbury to access health services at Nepean Hospital precinct. Extend the North-South Rail Link to Penrith with the existing rail within the Hawkesbury, and Outer Western Sydney Orbital Road Link with additional flood free crossings of the Hawkesbury River.

'Village' Lifestyle and Liveability Model

- Develop a sustainable "village" model of liveability for communities, with a focus on local services and employment would achieve improved lifestyle outcomes for communities.

Community Services Strategy

- It is recommended to develop a district wide Community Services Strategy to improve liveability outcomes for each local government area including outreach programs to all areas of the district. In addition, develop a system for provision of social services for each area including a coordinated approach between State and local government in the delivery of services including the key agencies such as NSW Family and Community Services (including Housing) and NSW Health (including the Nepean Blue Mountains Local Health District). Plan to include a district wide Community Services Strategy to improve regional liveability outcomes including outreach programs to all areas of the district with a coordinated approach between State and local government in the delivery of services (NSW FaCS and NSW Health/NBMLHD) Plan could recommend a NSW government funding scheme to address local social and community liveability indicators and improve liveability outcomes for new and emerging communities.
- A State government pool of funding (similar to the former Area Assistance Scheme) is needed to run programs that address local social and community liveability indicators and improve liveability outcomes for new and emerging communities.

Social Infrastructure and Investment

- There is a need to restore the 'real cost' S94 infrastructure levies for Western Sydney Council's rather than the cap of \$30K that will result in a shortfall of more than \$240 million of essential service infrastructure in the North West and South West Growth Sectors of Sydney where the bulk of Sydney's growth will occur.
- Establish a compulsory Community Investment Charge on all future Sydney development that will address the shortfall in human service provision across the Greater Western Sydney regions with a focus on place-making communities, social capital outcomes, and a sustainable 'village liveability' model that focuses on local community services and employment.

Housing Strategy

- It is recommended to develop a district-wide Housing Strategy that identifies the unique roles that each council will undertake addressing housing diversity, affordable and sustainable housing outcomes, and affordable rental housing targets specific to the population demographics of each local government area.
- There is a need to provide improved leadership on affordable housing, and to develop and implement the Affordable Housing Target of 5 to 10% with a clear and compulsory mechanism that covers both green-field and brown-field developments, infill developments, in addition to floor-space bonuses.
- "Undertake broad approaches to facilitate affordable housing". In addition to amendments to existing tenancy legislation to allow longer leases, remove the "no grounds" evictions clause to improve security of tenure for tenants and reduce people being evicted into homelessness without cause.
- Include a compulsory mechanism/s for affordable housing in all forms of future housing development. Additionally remove 'no grounds' eviction clause in tenancy legislation to improve security of tenure and reduce people evicted into homelessness without cause.

Affordable Rental Housing

- More aspirational targets on affordable housing are needed.
- Reference to the GSC's Affordable Rental Housing Targets of 5-10% needs to be clearer that this target is a minimum target level and that it is compulsory for all development to address the loss of affordable rental housing and market failure in the private rental market to provide affordable rental housing as evident over the last three decades. A more ambitious target of up to 30% would be necessary to address the loss of affordable rental housing for low, very low, and middle income households in Greater Sydney. In this section the GSC's Affordable Rental Housing Targets of 5-10% should be clearer that 'Affordable Rental Housing' refers primarily to housing where the title of properties will be transferred to a registered Community Housing Provider (CHPs) to ensure that it will continue to provide affordable rental housing to low and very-low income households perpetually beyond a 10 year timeframe and provide the CHP organisations with greater leverage to develop more affordable rental housing and invest cash contributions to grow their affordable housing portfolios.
- A different mechanism should be developed for the 5-10% Affordable Rental Housing Target in green-field and brown-field development as well as for infill developments for areas such as the Western District of the GSC. The GSC's Affordable Rental Housing Targets of 5-10% should be clearer that its primary purpose is to provide a public/community benefit to improve liveability outcomes of low to very low income households.
- Plan to review minimum targets for Affordable Rental Housing to around 20% to address the loss of affordable rental housing and market failure in the private rental market for low, very low, and middle income households.
- Include a compulsory mechanism/s for affordable housing in all forms of future housing development.
- The Plan to be clearer that 'Affordable Rental Housing' refers to housing where the title of property is transferred to a CHP to ensure it increases the levels of affordable rental housing into the future and provides leverage to invest in more affordable rental housing.
- Be clearer that the purpose of Affordable Rental Housing Targets is to provide a public/community benefit to improve liveability outcomes.

Intergenerational Equity and Access

- There is a need to develop strategies that reverse the growing income inequities and intergenerational inequity that has developed over the last three decades between East/North-East Sydney and Greater West/South West Sydney. For reference, see the SEIFA maps presented by Professor Bill Randolph at the GSC Forum in Blacktown on 10 March 2017 (by WSROC and WSCF). Research shows that growing inequity between high income and low income areas lowers the liveability of both areas resulting in the break-down of social inclusion, social cohesion and poor liveability outcomes for all communities across greater Sydney. The Plan should support strategies that reverse the growing income inequities and intergenerational inequity between East/North-East Sydney and Greater West/South West Sydney to improve liveability, social inclusion and cohesion for ALL communities across greater Sydney.
- There is also a need to protect services in the Hawkesbury from greater Sydney growth impacts while improving access to regional services.

Sustainability

- The draft plan articulates well the environmental opportunities and their benefits for the Greater Sydney Basin but is limited in innovative solutions to support agriculture and farming. There is acceptance of the need to conserve and protect parklands, national parks and increase rural residential opportunities, but little guidance on how to achieve the viability of farming within the MRA. A better balance could be achieved by citing innovative ways to promote agriculture as a way to preserve and protect the MRA – solutions cited in the draft plan and draft district plans are very housing provision orientated.
- Strategy 29.1 on page 139 cites rural residential as a solution to maintaining or enhancing the MRA and this raises concern regarding heightened land use conflict with agricultural uses (i.e. odour, noise, dust, etc.). A change to the wording of Strategy 29.1 in the draft plan is recommended as follows: “Maintain or enhance the values of the Metropolitan Rural Areas using place-based planning to deliver targeted environmental, social and economic outcomes, including well planned and considered rural residential development, eco-tourism and agribusiness opportunities”. The sole use of rural residential in this strategy has already enlisted a response from developers at a local level that there is a green light to carve up the MRA into rural residential land lots, as there is limited understanding of what “Place-based Planning” is or means.
- Restricting urban development can be used effectively in protecting large tracts of land at a relatively low cost however this approach can be easily "un-done." The MRA is a policy statement of the current draft plan that will only need a change in the political climate or an interpretation of the local Planning Panel that could lead to a decision of encroachment upon the restricted area. Multiple ways to protect the MRA, including incentives for farming and land management in the Greater Sydney Basin should be considered within the draft plan and draft district plans. If this is not considered the share of Sydney's vegetables grown within the city's food basin could crash to just 1% in the next 15 years with the potential of large landholdings in the MRA becoming overridden with land management issues (i.e weeds). Sustainable food sources close to Sydney is important for future food security, particular against a context of global warming, increased aridity in western NSW, and increasing food transport costs (“food miles”)
- Page 64 – environmental heritage is often different to listed statutory items. It is recommended that an alignment between listed heritage items in LEPs and the state heritage list needs to occur
- The inclusion of Objective 35 More waste is re-used and recycled to support the development of a circular economy is applauded – this objective won't solve the target issue but it is advocating to do as much as we can.

Protection of the Metropolitan Rural Area (MRA)

- The document would be enhanced by citing best practice projects that demonstrate good management of the MRA.
- It is disappointing that there is no reference to the outer orbital corridor and the potential buffer this could be used as the “fence in the paddock” delineating the extent of the urban sprawl and ultimately protecting the MRA. There is reference to the use of corridors on page 73 of the draft plan and page 58 of the draft Western City District plan in relation to corridors usage to reduce the potential for conflict in the future, however greater emphasis needs to be given to its use as a mechanism to protect the MRA.
- More emphasis should be placed on the implementation and the adoption of sound monitoring systems and compliance policies that protect agricultural practices and vegetation. Whilst acknowledging responsibilities as a regulatory authority, Councils have also recognised that some impacts from rural pursuits cannot always be mitigated to ‘no impact at any time’ and that this is part of being in a rural environment.

- The revision and adoption of the Rural Living Handbook to set the context of rural living and land use as an educative tool for the community to raise awareness and outline policy and best practice approaches, could be a solution to assisting in the implementation of the draft Plan. Often “Tree Changers” do not give consideration to the proximity to public transport, extra time to travel to work, rural noise, odour and agricultural activities, availability of local amenities and utilities like supermarkets, street lights, kerb and guttering, mobile phone reception, internet, TV reception and in some areas these services may not be available at all. Often there are deep chasms between city residents' expectations of country life and their experience and the Rural Living Handbook is a good awareness raising tool that could be delivered at the grassroots level at a minimal cost. The surge in "amenity migration" has placed significant pressure on services in the Peri Urban areas and the real challenge is policy development and planning for this population which minimizes the economic, social and environmental costs while providing high-quality lifestyles.
- The South Creek corridor is commended and should be highlighted as a model of best practice to be used to create great green corridors in a variety of other places across the Greater Sydney Area. However, in focusing on the South Creek catchment, the larger and more significant catchment of the Hawkesbury Nepean has been largely overlooked and needs to feature more prominently in terms of highlighting the issues and opportunities associated with the catchment.

Open Space

- Hawkesbury Council supports the concept of the green grid and considers that the draft plan does not adequately recognise the potential role Peri Urban Areas offer as part of the broader concept of an urban parkland.
- The proximity of the native bushland in the catchment areas to the Western Sydney Airport is a tourism opportunity that should not be overlooked. Consider the opportunities to develop a walking/hiking infrastructure within the District that would be one of Australia's great bushwalks.
- In order to create great spaces in areas currently publically available, there needs to be resources to maintain these areas, particularly from inner city residents who have little environmental green space of their own. We welcome visitors with open arms to share our green space, but need some equity in paying for this. One option for this would be to give back to our community from the money raised by selling the drinking water we protect. This money could be used to improve facilities at green spaces, and to fund green linkages through the green spaces.
- While the concept of the green grid is encouraged, the main focus of the green grid has been on metropolitan areas and fails to recognise the contribution that the Peri Urban areas of Sydney make to the provision of green space for the greater metropolitan area.

Heritage

- The Draft Western City District Plan does not fully reflect the significant heritage of the region, particularly within the Hawkesbury.
- In relation to heritage there is little direct recognition and response in the Draft Western City District Plan to the significant built heritage, and cultural landscapes that exists. The Hawkesbury Local Government Area has four of the five Macquarie Towns. The Plan should acknowledge the significant built heritage, and cultural landscapes that exists in the Hawkesbury area which has four of the five Macquarie Towns.

- There is no mention to the significant contribution of the region in the survival of the early colony and its intrinsic connection to rural and farming activities. The Plan should acknowledge the significant contribution of the region in the survival of the early colony and its intrinsic connection to rural and farming activities. The Plan should include and support the Hawkesbury's colonial townships, road layout, and Convict Trail as the best collections of early colonial buildings within the Sydney Metropolitan area.
- Need for recognition of the Convict Trail
- There is no mention of the established townships and the fact that there has been little change to road networks and the best collections of early colonial buildings within the Sydney Metropolitan area, and how the Draft Western District Plan will respond by maintaining this unique situation.
- The Plan should acknowledge and conserve the heritage of the Hawkesbury, its unique local character, and conserve and enhance Aboriginal, Non Aboriginal and natural heritage.
- The Plan should acknowledge and support the creative arts and culture in the Hawkesbury including the Hawkesbury Regional Gallery.
- The Plan should recognise and respond to the importance of the health of the rivers, waterways and wetlands on a District scale, e.g. Hawkesbury Nepean and South Creek, and link strategies with the history, heritage and tourism with the District's rivers, waterways and wetlands.

Blue Green Grid

- The Draft Western District Plan has identified within section 5 Sustainability; the delivering of the Sydney's Green Grid to promote a healthy community. Within the document there are a number of priorities which are inconsistent with the Green Grid and Council's capacity to fulfil the State Government strategic outcomes. These inconsistencies will disadvantage Council in achieving core outcomes in the District Plan.
- It is noted that the Green Grid in the Draft Western District Plan has been based on previous strategies of the Regional Recreational Trails Framework (RRTF) prepared in 2005 which outlined significant recreational trails that impact Council including:
 - Great River Walk
 - South Creek Corridor
 - Eastern Creek Corridor
 - Sub-Regional trail from the North West Growth Sector to Windsor (Windsor Road Cycle Link).
- These trails have been transferred to the Green Grid plan, however changes have reduced the capacity of the Green Grid to fulfil its aim of connecting trail corridors.
- As identified in the listed priority projects, Priority Project 1, South Creek, would be the only one that has some reference to the Hawkesbury, however Council has only limited land with which to apply and this land is either operational (McGrath Hill STP) or leased properties.
- The Plan acknowledge Hawkesbury's role and limited capacity to fulfil the State Government's Strategic Outcomes in Sydney's Green Grid and if the GSC is seeking to develop these and other trails in addition to the development of these strategic plans it will need to drive these projects and assist physically:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects

- not restrict funding to 50/50.

Eastern Creek Recreation Corridor

- The corridor is identified as a regional corridor extending from Macarthur in the south for some 48km, however upon reaching the boundary of the Hawkesbury Local Government Area the "Regional" status of the trail is stopped and becomes optional for Council as a local trail to fulfil as a connection for a distance of approximately 2.5km.
- Within the original 2005 RRTF document this trail maintained its Regional Status up to its connection with the Hawkesbury-Nepean River and the Great River walk.
- If the GSC is seeking to develop these and other trails in addition to the development of these strategic plans it will need to drive these projects and assist physically:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects
 - not restrict funding to 50/50.
- The Plan acknowledge Hawkesbury's role and limited capacity to fulfil the State Government's Strategic Outcomes in regard to the Eastern Creek Recreation Corridor and if the GSC is seeking to develop these and other trails in addition to the development of these strategic plans it will need to drive these projects and assist physically:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects
 - not restrict funding to 50/50.

South Creek Recreation Corridor

- The corridor is identified as a regional corridor extending from Macarthur in the south for some 48km and looping through St Marys and returning through Marsden Park, again reaching the boundary of the Hawkesbury Local Government Area the "Regional" status of the trail is stopped and becomes optional for Council as a local trail to fulfil as a connection for a distance of approximately 8km.
- Within the original 2005 RRTF document this trail maintained its Regional Status up to its connection with the Hawkesbury-Nepean River and the Great River Walk.
- If the GSC is seeking to develop these and other trails in addition to the development of these strategic plans it will need to drive these project and assist physically:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects
 - not restrict funding to 50/50.
- The Plan acknowledge Hawkesbury's role and limited capacity to fulfil the State Government's Strategic Outcomes in regard to the South Creek Recreation Corridor and if the GSC is seeking to develop these and other trails in addition to the development of these strategic plans it will need to drive these projects and assist physically:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects
 - not restrict funding to 50/50.

Great River Walk

- The Great River Walk is one of the largest and most comprehensive regional trails that once achieved will be a significant tourist trail, however the Green Grid documentation has misrepresented the walk as “The Great North Walk” and this requires amendment.
- The Great River Walk has its own committee made up of representatives from Penrith, The Hills and Hawkesbury councils, in addition to representatives from NPWS and the bushwalking community. The group has been in existence for over 10 years and has seen the development of the trail in Penrith and the Hawkesbury to a limited degree. To develop the trail further the West District Plan would need to include strategies that achieved this, including:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects
 - not restrict funding to 50/50.
- The Plan acknowledge Hawkesbury’s role and limited capacity to fulfil the State Government’s Strategic Outcomes in regard to the Great River Walk and if the GSC is seeking to develop these and other trails in addition to the development of these strategic plans it will need to drive these projects and assist physically:
 - compulsory acquire the trail route
 - provide funding for capital improvement for the trails to function
 - provide funding for environmental restoration projects
 - not restrict funding to 50/50.
- Potential impacts to the District of the Western Sydney Airport (24 Hour)
 - Traffic
 - Amenity
 - Tourism
 - Air quality and noise

Other Identified Opportunities

Hawkesbury City Council sits on the boundary of one of the largest growth centres, The North West Growth Sector extending from Box Hill, Riverstone Vineyard, Rouse Hill and The Ponds.

- This area has seen significant population growth with further growth in the near future through the Box Hill area. This population increase has seen an increase in the use of regional recreational spaces in the Hawkesbury especially sites that have direct connection to the Hawkesbury River. Council has seen an increase in boating activities and use of Council’s only major boat ramp within the area.
- The Roads and Maritime Service “Boat Ramp Locator” website has identified only two ramp access to the Hawkesbury River within 20km of the North West Growth Sector with the next available accesses to the water some 35+km at Berowa Waters and towards Sydney. With the increased popularity in boating, increased demand for use of both the ramps and recreational spaces has been identified and significant funding is required to improve and manage these.
- Council has also identified a number of regional trail routes that would improve connection including the Windsor Road Cycle trail connection that extends from Bella Vista to Windsor, with connection to the M7 cycle route and Parramatta. In addition the Killarney Chain of Ponds recreation trail is feasible following the creek corridor from Rouse Hill, Box Hill, McGraths Hill and linking to the South Creek Corridor and the Hawkesbury River.

- The Plan recognise, protect and support with State resources, Hawkesbury's role in providing essential green space for growing Sydney including Hawkesbury's recreational spaces, funding to improve and manage increased river use with only one boat ramp, and improved connection for cycle-paths, and road and recreational trails identified between the Hawkesbury and North West Growth Sector of Sydney.

Hawkesbury's National and State Parks and Waterways

- The heritage of Hawkesbury's large areas of National Parks and State Parks should be acknowledged in the Draft West District Plan. The regions role in providing vital green space for growing Sydney needs to be recognised, protected and supported with State resources. Pristine and wild rivers such as the Wollongambe, the Colo and Grose rivers needs to be protected, and better water quality monitoring of the regions rivers, creeks and wetlands must be supported by State funding for monitoring with compliance powers for both councils, EPA and other relevant authorities. Better protection from conflicting land uses and tourist potential of bird watching sites and historical landmarks, both Aboriginal and Non Aboriginal, should be explored.
- The Plan recognise, protect and support with State and Federal resources, Hawkesbury's large areas of National and State Parks and Hawkesbury's role in providing essential green space for growing Sydney

General Matters

- A sound governance structure is essential to deliver on the draft plan and draft district plans, in particular the green grid – this will need to incorporate all levels of government and have a mechanism that is able to incorporate stakeholder engagement
- There is limited reference in all the draft planning documents to how to monitor the implementation of the Plans – it is essential to have metrics that support how to do this.

Integration of Local Government Community Strategic Plans

Both the draft plan and draft District Plans would be enhanced if there was a greater focus on the integration of the Local Government Community Strategic Planning framework into the documents. The integration of Community Strategic Plans could assist in the monitoring and implementation of all the draft plans. There is reference to Council Community Strategic Plans on page 163 of the draft plan and a good visual linkage is also shown in the figure titled Relationship of regional, district and local plans in the district plans. This linkage should be emphasized more throughout the document to ensure innovative and collaborative approaches in the implementation of the draft plan and draft District plans. Reasoning for this approach follows:

- Each Council's Community Strategic Plan provides a vehicle for the community to express short and long-term aspirations. However, these aspirations will not be achieved if they are out of sync with the draft plan and draft District Plans and without sufficient integrated resources (time, money, assets and people) to implement them.
- The Community Strategic Plan contains Council's Resourcing Strategy (i.e. Long-Term Financial Plan, Asset Management Plan and Workforce Plan). The Resourcing Strategy is a critical link when translating strategic objectives into actions. The Resourcing Strategy makes clear what elements of the Community Strategic Plan the Council will take responsibility for and will implement. Other levels of government, business, non-government organisations, community groups and individuals will also have a role in achieving the outcomes of the Community Strategic Plan.
- The Resourcing Strategy also dictates how the Delivery Program and Operational Plans of each Council will be achieved. This includes other strategic plans such as Housing Strategies, Local Environmental Plan, Disability Inclusion Action Plan, Environmental Strategies, Tourism Strategy; Economic Development Strategy; Social Planning Strategy; Smart City Plan; Information and Communications; Technology Strategy etc.

- Local Government Community Strategic plans and their Resourcing Strategy (rather than solely the Local Environmental Plan) inform each Councils delivery and operational plans.
- Council's Delivery and Operational Plans are the "what we do" and if it is not in the plans it is unlikely to be implemented.
- An opportunity exists to greater leverage and integrate the draft plan and draft District Plans with Local Government's Community Strategic Plans to ensure an integrated approach to the delivery of infrastructure and resources – LEPs do not plan where dollars and resources are to be allocated and what projects are to be rolled out – Council's Delivery Program and Operational plans are a core element in the delivery of the Greater Sydney Commissions Regional Plan objectives in the Directions for Infrastructure and Collaboration section of the Draft plan and draft District Plans
- Objective 39 and commentary on page 163 of the draft Plan refers to the importance of Community Strategic Planning of Local Government however the LEP is the main document that is cited throughout the draft plan and draft District Plans as the conduit to delivering at a local level. Community Strategic plans need to be more visible throughout the GSC planning documents as this plan complements the LEP and outlines how Council is going to deliver on its LEP.
- The incorporation of the Community Strategic Plan is able to be readily accommodated at multiple points in the draft plan. For example, the Ten Directions and Planning Priorities can easily be linked to refer to social, economic, environmental and other outcomes contained in the Community Strategic Plans at the local level
- Other linkages could ensure that planning within the MRA is consistent with the environmental, social and economic values detailed in the Councils Community Strategic Plan

Peripheral Urban Area – "Peri Urban" Identity and Space

- The Peri Urban spaces in the Greater Sydney Region are not transitional or temporary, rather multifunctional and dynamic which leads to an identity and integrity in its own right. It is a multifunctional landscape area that connects people with produce, has enormous scenic amenity, a recreation and tourism source and multiple environmental values such as a carbon sink, a biodiversity resource, a water catchment for Sydney and "green lungs" to replenish Sydney's air quality.
- The Sydney Peri Urban Area is a legitimate third space that is wedged between metropolitan urban areas and rural spaces. It challenges the urban-rural dichotomy and suggests the redundancy of this division. The Peri Urban space holds the potential to bring urban (town) and rural (country) spaces together, and an approach that acknowledges Peri Urban and recognises interdependencies may deliver more positive outcomes for the space.
- The Sydney Peri Urban identity is not one-dimensional or monofunctional; rather it is the sum of many parts, which may take the forms of land-uses, activities, functions and services. Inherent in this identity is opportunity, through the establishment of new land uses which aim to co-create rather than compete. A key opportunity includes the combination of the Peri Urban production potential and its environmental and aesthetic assets.

- Planning solutions and limited policy development to protect natural assets and productive lands from urban growth, historically have not succeeded, with the result that the Peri Urban landscape has become highly contested and confused. The prevailing view identifies this space as having no firm identity, inevitably transitioning to residential use. Indeed the word Peri Urban is viewed as a wicked issue, a word that is ignored rather than embraced. There is limited reference in the draft plan for direct funding and policy development for the Peri Urban areas.
- The Peri Urban area has an unexpected interface that is focused as much on cultural issues, heritage, relationships as well as agriculture and food production of which much of the narrative in the draft plan is focused on. The ties that bind the Peri Urban area are strong, but often informal and as part of this interface, local food is combining with social and cultural influences, driving an opportunity to rethink tourism opportunities, agribusiness initiatives and the agrifood system. The draft plan could give more weight to this issue and articulate the need for innovative policy development and funding opportunities specific to the Peri Urban area.
- Peri Urban areas do not fit “nicely” into funding guidelines or criteria’s and often slip through the net when grant and policy development opportunities do arise. There is a lack of policy settings and funding programs for Peri Urban areas in the Greater Sydney Region.
- The Sydney Peri Urban areas are facing challenges that have developed in response to population-growth requirements that often are neither socially nor economically sustainable. Large areas of greenfield land is being developed for new towns with limited commitment to the required infrastructure to support this growth. There is a high risk that quality of life could potentially be forfeited in the name of affordability for the consumer and profit for the developer.
- For individuals wishing to produce in the Peri Urban space there are additional challenges, including land prices, the 'right to farm', water availability, sustainability and land management, transport infrastructure, the cost-price squeeze, public perceptions, business administration and legislative issues
- There is awareness in the draft plan and draft district plans that the challenges to agriculture relate to economic, social, environmental and technological factors, but are silent on a strategic way forward to influence policy decisions about land use, production and distribution processes, demographics or landscapes.

HCC are happy to discuss this submission further and look forward to the opportunity to continue to engage with the Commission on the issues raised in this submission and any other matter related to good planning outcomes for the Greater Sydney Region.