

27 January 2016

NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Lodged via on-line submission: http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=7313

Dear Sir/Madam,

RE: SYDENHAM TO BANKSTOWN URBAN RENEWAL CORRIDOR STRATEGY

Thank you for the opportunity to provide a submission in relation to your draft strategy.

You have an important role to play in protecting and enhancing the environment, creating liveable places and increasing community resilience, particularly to hazards such as flooding and heatwaves. Your development of a strategic planning framework to guide future development and infrastructure delivery within the Sydenham to Bankstown Urban Renewal Corridor over the next 20 years provides a wonderful opportunity in this regard. Accordingly, we submit the following for consideration:

1. Cooks River Alliance

- 1.1 We are a voluntary Regional Organisation of Councils of 8 councils within the Cooks River catchment. We function at the political and staff level to improve the health of the Cooks River. Our Member Councils cover 92% of the catchment and represent a population of ~820,000.
- 1.2 We possess ~20 years' experience in catchment stewardship through advancing and supporting sustainable environmental and urban water management. This necessarily involves a strong connection and working relationship with the community and other stakeholders. We are therefore able to play a key role in development and infrastructure delivery for vital, sustainable and resilient communities.
- 1.3 This submission harnesses the technical, experiential and local knowledge of our 8 Member Councils as well as key stakeholders. The recommendations we make below echo what we do and say, for example, under our [Action Plan](#).
- 1.4 We have addressed primary elements of the Strategy that relate to our area of interest. Please note that this does not mean that we endorse (or reject) the remaining elements.



2. Summary of submission

- 2.1 The NSW Government in [A Plan for Growing Sydney](#), recognises liveability as Sydney's competitive advantage.
- 2.2 Therefore, the Strategy should articulate liveability as a strategic priority.
- 2.3 The Cooks River is a highly valued, central element and essential component of liveability within the Sydenham to Bankstown Corridor. It continues to suffer the legacies created from planning decisions.
- 2.4 Therefore, the Strategy should include a vision for the Cooks River and strategies for the River's conservation, preservation, protection, enhancement, connectivity and maintenance. We suggest a vision that enhances the ecological health of the River.
- 2.5 Natural areas and sustainable urban water management initiatives (such as raingardens, gross pollutant traps, bank naturalisation and stormwater quality improvement devices) within the Sydenham to Bankstown Corridor (and the catchment more broadly) contribute to the ecological health of the Cooks River.
- 2.6 Therefore, the Strategy should include a vision for:
- a) Natural areas and strategies to conserve, preserve, protect, enhance, connect and maintain natural areas.

We suggest a vision that enhances the health of natural areas.
 - b) Urban water and strategies for its sustainable management.

We suggest a vision transforms the Corridor into a water sensitive corridor.
- 2.7 All strategies should be implemented in accordance with the principles of ecologically sustainable development to achieve ecological outcomes.

3. Recommendations and rationale

- 3.1 The Cooks River is a key strategic asset within the Corridor. It is a vital central unifying element, biodiversity corridor and one that is highly valued by the community for its amenity, culture and history, existence value and myriad other ecosystem services.
- 3.2 The NSW Government's [A Plan for Growing Sydney](#), the Government's main plan for guiding land use and planning decisions across the metropolitan region over the next 20 years recognises liveability¹ as Sydney's competitive advantage. To achieve the vision of 'a strong global city, a great place to live', four goals are articulated:
- a) A competitive economy with worldclass services and transport
 - b) A city of housing choice with homes that meet our needs and lifestyles
 - c) A great place to live with communities that are strong, healthy and well connected
 - d) A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.
- 3.3 The Cooks River and natural areas within the Corridor are highly valued and essential components of liveability and directly contribute to achievement of the above goals.

¹ We adopt a 'societal needs' approach to liveability – see Phillip Johnstone, Rachelle Adamowicz, Fjalar J. de Haan, Briony Ferguson and Tony Wong. (2012) Liveability and the Water Sensitive City - Science-Policy Partnership for Water Sensitive Cities. Melbourne, Australia: Cooperative Research Centre for Water Sensitive Cities, ISBN 978-1-921912-17-7, August 2012.

3.4 Therefore, the Strategy must prioritise the conservation, preservation, protection, enhancement, connectivity and maintenance of the River and natural areas.

3.5 With this introduction in mind, we make the following recommendations:

Section	Pg	Recommendation	Rationale
Key considerations	2	The Strategy be informed by a corridor-wide ecological assessment.	<p>Recognise the structure and function of the natural urban environment and to allow strategies to be developed for its conservation, preservation, protection, enhancement, connectivity and maintenance.</p> <p>Emphasise and promote environmental awareness.</p> <p>To demonstrate environmental stewardship and to recognise the value of natural environments.</p> <p>Achieve goals c) and d) of the NSW Government goals for Sydney.</p>
Vision Parks and Open Space	4	<p>Separate nature conservation areas and river corridors from the definition of 'open space'.</p> <p>Develop a separate vision for nature conservation and river corridors that prioritises ecological values and outcomes.</p> <p>Indicate that the vision for intensification is not to apply where ecological health has the potential to be impacted.</p>	<p>'Open space' is defined in the Open Space And Recreation Strategy. The Vision for open space in the overarching Strategy is to 'improve the quality of and intensify the use of existing open space and facilities...' Intensifying the use of open areas, in particular river corridors can impact upon ecological health and thus liveability. Intensification should not be at the expense of maintaining environmental quality and values.</p> <p>On a reading of the term 'open space', readers may not consider nature conservation and river corridors as captured in that term, which will create confusion.</p> <p>Achieve goals c) and d) of the NSW Government goals for Sydney..</p>
	4	<p>The Vision should provide that all actions carried out pursuant to the strategy are in accordance with the principles of ecologically sustainable development to achieve ecological outcomes.</p> <p>Ecological sustainability should be clearly defined drawing upon:</p> <p>a) section 6(2) of the <i>Protection of the Environment Administration Act 1991</i>;</p> <p>b) the NSW Whole of Government Sustainability Principles 2006;</p> <p>c) section 4 of the Commissioner for Environmental Sustainability Act 2003 (Vic),</p>	<p>Activities undertaken in accordance with the strategy must ensure that 'nature conservation' and 'river corridor' assets are conserved, preserved, protected, enhanced and maintained based upon clearly defined ecological objectives (e.g. meeting the NSW Water Quality and River Flow Objectives and targets of the Botany Bay Water Quality Improvement Plan). Thus, for example, in the provision of opportunities 'for a mix of low, medium and high rise residential and mixed use developments' (Vision 1), those opportunities must not impact upon the water quality of the Cooks River and, indeed, are an opportunity to improve its water quality.</p> <p>Urban development has a major influence on stormwater runoff and therefore environmental impacts on waterways.</p> <p>The wetland and bushland surrounding the Cooks River provides vital habitat for native plants, birds and other flora and fauna.</p> <p>Achieve goals c) and d) of the NSW Government</p>

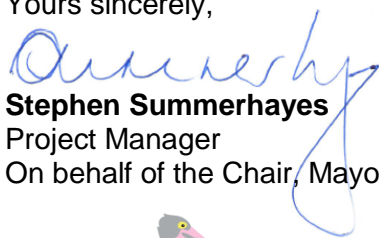
		<p>and should clearly articulate that an ecologically sustainable approach requires that all activities:</p> <ul style="list-style-type: none"> i) are based upon a participatory, integrated, adaptive, multidisciplinary and intersectoral approach; ii) consider the environment in its own right, rather than environmental imperatives being balanced against socio-economic considerations; and iii) address a changing climate. 	goals for Sydney.
	4	<p>Include a vision to transform the corridor into a water sensitive corridor.</p>	<p>A water sensitive corridor is a paradigm of sustainable urban water management integrating three city concepts: cities as water supply catchments, cities providing ecosystem services and cities comprising water sensitive communities. It is essential to liveability.</p> <p>Water forms part of our natural capital. It fulfils multiple functions across social, cultural, ecological, spiritual, and political domains The NSW Department of Planning and Environment is ideally placed to lead many activities that impact upon urban water management.</p> <p>Achieve goals c) and d) of the NSW Government goals for Sydney.</p>
	4	<p>Apply the NSW Office of Environment and Heritage Urban Green Cover Technical Guidelines to the Urban Renewal Corridor.</p>	<p>The guidelines contribute to liveability by informing 'how to incorporate vegetated, permeable and reflective surfaces into urban settings, to address thermal loading in the built environment and provide co-benefits such as reduced energy costs for cooling, stormwater management, cleaner air and biodiversity habitat'.</p>
Connecting open space	10	<p>Include an aim to develop a biodiversity corridor along the Cooks River and reaching into adjoining urban areas by enhancing and connecting existing bushland and other biodiversity habitat area (including native trees, connecting streams and verge gardens).</p>	<p>Biodiversity and habitat are vital elements of the health of the Cooks River and highly valued by the community.</p> <p>Achieve goals c) and d) of the NSW Government goals for Sydney.</p>

We look forward to hearing how this submission has been considered and applied.

If you wish to discuss any element of the above, please do not hesitate to contact me on 9748 9644.

Thank you once again.

Yours sincerely,



Stephen Summerhayes

Project Manager

On behalf of the Chair, Mayor Brian Robson



Working together
for a healthy
Cooks River catchment