

1.0 Introduction	Priorities and actions	Comments
West District – Implementation and monitoring actions	<i>Action IM1: Align land use planning and infrastructure planning</i>	<p>Council strongly supports this action and the development of an Annual Infrastructure Priority List.</p> <p>It is recommended that as part of the preparation of an Annual Infrastructure Priority List, the Greater Sydney Commission (GSC) detail the methodology behind the identified priorities. It is suggested that methods such as a baseline needs analysis, gap analysis and cost-benefit analysis are considered to ensure various Districts' are equally represented on the list.</p> <p>It is also proposed that Council's be identified as a partner in this action since local infrastructure is a fundamental part of the overall infrastructure suite.</p>
	<i>Action IM2: Develop a framework to monitor growth and change in Greater Sydney</i>	<p>This action and the following are closely related in that the monitoring framework in Action IM2 will likely use data and relevant information obtained via the Greater Sydney Dashboard to measure Greater Sydney's economic, social and environmental performance.</p> <p>The two actions should be merged into a combined process that will develop such a framework while also determining the metrics to be used.</p> <p>Information on a local level should also be made available on the Dashboard and to local organisations.</p>
	<i>Action IM3: Develop an interactive information hub – the Greater Sydney dashboard</i>	<p>The framework identified in IM2 and the Greater Sydney Dashboard will provide a consistent measurement framework for Greater Sydney and establishing ongoing data sources and portals will be a valuable tool for local governments.</p>
	<i>Action IM4: Report on local planning</i>	

3.0 A Productive City	Priorities and actions	Comments
3.2 Creating a framework to deliver the Western City	3.2.1 The Western Sydney City Deal-governance <i>Action P1: Establish the Western Sydney City Deal</i>	Council strongly supports the establishment of the Western Sydney City Deal to deliver transformative change to Western Sydney by leveraging particularly off major catalysts such as the Western Sydney Priority Growth Area (WSPGA) and the Western Sydney Airport and its related transport infrastructure.
	3.2.2 Elements of the Western City	
	3.2.3 Identify alignments and preserve regionally significant north south and east west rail and road corridors for the Western City	<p>The preservation of new road and rail corridors, particularly north-south connections, are fundamental to unlocking the economic development opportunities and growing the Western Sydney economy.</p> <p>Reference to 'Identify alignments and preserve regionally significant north south and east west rail and road corridors for the Western City' must be identified as an action to inform current and future strategic land use planning and to deliver on the vision for the Western City. This would also ensure consistency with the South West District Plan, linking north-south connections through the Western Sydney Airport</p> <p>The identification of north-south passenger rail transport connections to the Western Sydney Airport, with rail provided before or at the opening of the airports operations, must be recognised as a priority.</p>
	3.2.4 Identify economic development priorities for the Western City <i>Action P2: Develop and implement an Economic</i>	It is noted that three economic development strategies for the Eastern, Central and Western Cities will be prepared. It is essential that the Western City Economic Development Strategy also strongly considers District-level education and skills development. This is critical to retaining the local Western Sydney workforce and reversing the need to travel to the Eastern City for professional and higher-order knowledge jobs.

	<p><i>Development Strategy for the Western City</i></p>	
	<p>3.2.5 Plan for a 21st Century aerotropolis with 21st Century amenity</p> <p>PP1: Create high quality urban amenity across the Western City</p>	<p>The vision for the Western Sydney Airport aerotropolis is often discussed as a future ‘21st century city’, however there are no clear guidelines or characteristics to identify what this means in terms of design, density, amenity or sustainability. Principles should be outlined that provide guidance on the elements that create a 21st century city.</p> <p>Productivity Priority 1 identifies that relevant planning authorities must establish an urban design framework for the development of centres, commercial areas and transport infrastructure. It is unclear whose responsibility it is to establish the framework, however it is suggested that the framework be developed by the GSC in consultation with Council’s and the Office of the Government Architect.</p> <p>It is important that any future design framework also applies to large scale infrastructure projects, which also play an important role in contributing to urban amenity.</p>
<p>3.3 Building international tourism</p>	<p><i>Action P3: Develop infrastructure to support the growth of the visitor economy</i></p> <p>PP2: Support the visitor economy</p>	<p>The draft Plan appropriately reflects the role of tourism as a major economic driver within the District. The acknowledgement that the District needs supporting infrastructure to accommodate the growing level of international and domestic tourists is welcomed.</p> <p>Action P3 refers to the GSC establishing the necessary governance arrangements to develop a coordinated destination management plan for the District. The three Council’s within the West District have an established Strategic Alliance, and are seeking to create a Regional Tourism Organisation, which could be considered as an existing governance arrangement. It is recommended that the Plan be amended to include reference to this arrangement, working closely with the GSC to deliver the Destination Management Plan.</p> <p>The diversification of tourism opportunities is also supported, however it is recommended that Penrith’s ‘adventure tourism’ be acknowledged as part of this action as a growing sector that is unique to the West District.</p>

		Productivity Priority 2 identifies that Council's should allow for a variety of tourism opportunities within Local Environmental Plans. There is limited scope through local environmental plans in supporting the visitor economy beyond zoning land for specific tourism purposes, therefore the effectiveness of this Priority may be limited.
3.4 Planning for job target ranges for strategic and district centres	<p>3.4.1 Plan for the growth of centres</p> <p><i>Action P4: Development and implement a centres framework for the District</i></p>	<p>Action P4 is a valuable initiative, as this will assist Council's in planning for existing and new centres.</p> <p>It is unclear if the centres framework will apply only to growth areas, as the supporting text underneath the action states "The Commission together with local Councils, will develop a centres framework which covers the two Priority Growth Areas". It is recommended that, as the action describes, implement a centres framework for the District and not just the Western Sydney Priority Growth Area.</p> <p>It should also be noted that there is only one Priority Growth Area (the WSPGA), within the West District.</p> <p>As detailed in Council's submission, the nominated jobs targets for Penrith City Centre and St Marys are underwhelming in the context of the proposed Western City. Council would appreciate the opportunity to discuss this matter and develop a more appropriate jobs target with the GSC as part of the review of the Plan, that more accurately reflects Council's recent analysis as part of the preparation of the Penrith Economic Development Strategy.</p>
3.5 Planning for Greater Penrith as Sydney's Western gateway	<p><i>Action P5: Coordinate activities to grow jobs in Greater Penrith</i></p> <p><i>Action P6: Develop the Greater Penrith gateway corridor as a major tourism, cultural, recreational and entertainment hub</i></p>	<p>Recognition of the role of the Penrith City Centre and the Penrith Health and Education Precinct within Action P5 as 'Greater Penrith' and the 'Penrith Health and Education Super Precinct', are strongly supported, particularly in regard to Penrith being nominated as a Collaboration Area. Council is currently working closely with the GSC to identify Priority Precincts and relevant partners to further support and embed within the Plan to guide future collaborations. While the plan acknowledges that the main focus for economic activity in the West District is the corridor between Greater Penrith and St Marys, including the health and education super precinct, and Richmond-Windsor and Katoomba, more focus need to be given to this established economic corridor in terms of delivery knowledge-intensive jobs.</p>

	<p><i>Action P7: Enhance public transport access to the Penrith City Centre</i></p> <p>PP3: Manage growth and change in strategic and district centres, and, as relevant, local centres</p>	<p>Action P6 identifies the Greater Penrith gateway corridor which is strongly supported as it aligns with Councils' vision for Penrith City Centre as a hub in its own right, as well as a gateway to the Blue Mountains and the Central West. It is recommended that action P6 clarify that the gateway corridor includes Panthers precinct, the Nepean River, and Penrith Lakes.</p> <p>Public transport access to the Penrith City Centre is a key priority in planning for Penrith as Sydney's Western Gateway. It is noted that Action P7 is the only action that relates to public transport within the draft Plan. It is recommended the scope of this action be expanded to identify and prioritise the planning for the following critical public transport priorities:</p> <ul style="list-style-type: none"> • North-south passenger rail, linking the South West Growth Centre to the North West Growth Centre with Penrith at the centre; • The Outer Sydney Orbital (M9); • Rapid bus services from the Western Sydney Airport to Penrith City Centre • Supporting infrastructure such as commuter parking <p>Action P7 outlines that more efficient, faster and better bus services to Penrith are required. More efficient local bus services will help ease Penrith's congestion, encourage more public transport use and Council would welcome the opportunity to work closely with Transport for NSW during the preparation of the <i>Future Transport Study</i> to identify a preferred network.</p> <p>PP3 advises Council's on the matters to be considered when preparing strategies for strategic, district and local centres. Such guidance provides a clear link between the District Plan and Council's local planning strategies and Local Environmental Plans.</p> <p>Penrith's current retail strategy will need to be updated to be consistent with the key considerations outlined within the Priority. Until this occurs, proponents will be required to demonstrate consistency against these considerations, and most likely need to prepare a comprehensive supporting strategy addressing all of the considerations to inform the Planning Proposal. It is likely that the scope of such strategies will be lengthy and costly, and may be particularly onerous for minor LEP amendments (such as height or floor space amendments). It is recommended that the Priority apply where only a 'significant change' (such as a rezoning) is proposed.</p>
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<p>3.6 Increasing, strengthening and diversifying the skill base</p>	<p><i>Action P8: Support skills development as Western Sydney Airport is constructed</i></p> <p><i>Action P9: Encourage opportunities for new Smart Work Hubs.</i></p>	<p>The vision outlined within <i>Towards a Greater Sydney 2056</i> aims to grow the number of smart jobs in Western Sydney. A stronger commitment to training and upskilling strategies for the local Western Sydney workforce must be embedded in the Plan to ensure that the workforce are able to move into the jobs of the future. It is recommended Action P8 is broadened to include skills development more generally across Western Sydney, by collaborating with education providers and industry.</p>
<p>3.7 Accessing a greater number of metropolitan jobs and centres within 30 minutes</p>		<p>Underpinning this priority area is the need for better transport connections to achieve the vision of increasing the range of jobs and centres within 30 minutes travel time. However, as detailed in Council’s submission, there is an inherent lack of commitment, prioritisation or identification critical new transport infrastructure, beyond projects which have already been identified and funded.</p> <p>It is recommended this section be supported by an action to preserve, upgrade and implement the following priority corridors:</p> <ul style="list-style-type: none"> • North-south passenger rail • Outer Sydney Orbital (M9) • Bells Line of Road/Castlereagh Corridor • M12/Elizabeth Drive upgrade • Mulgoa Road/Castlereagh Road • Mamre Road

3.8 Accessing local jobs, goods and services within 30 minutes	3.8.1 Planning for retail floor space demand in the West District PP 5: Prioritise the provision of retail floor space in centres	<p>Similar to the application of PP3, the scope of PP5 should only apply to those Planning Proposals that seek a significant change.</p> <p>It should also be noted that Planning Proposals are required to address Section 117 Direction 1.1 – <i>Business and Industrial Zones</i>, which outlines that employment zones must be retained. The application of this priority to Planning proposals may duplicate the existing assessment against the Section 117 direction.</p> <p>PP5 should be renumbered to PP4.</p>
	3.8.2 Planning for district centres	
	3.8.3 Transport connections to district and local centres	<p>The identification of priority transport connections within this section are supported. To reflect the connections to and from local centres, it is recommended that “Implementation of a high frequency bus services between Greater Penrith and local town centres” also be included.</p> <p>St Clair was previously identified as a village within the draft North West Subregional Strategy, however is not identified as a local centre within the draft Plan. St Clair is considered to be an important local centre for the eastern part of Penrith Local Government Area and should be identified as a local centre in Figure 3-9.</p>
3.9 Managing freight activities	<i>Action P10: Identify and plan for efficient movement of freight, to, from and within the District, with the least impact on residents’ amenity.</i>	The Greater Sydney freight assets map shows a proposed intermodal terminal in St Marys. In order to facilitate the intermodal terminal in St Marys, direct transport connection to the proposed Outer Sydney Orbital route is critical with surrounding road infrastructures network upgrade to meets its demand. This should be reflected in the final Plan.

3.10 Managing employment and urban services land	<p>PP4: Protect and support employment and urban services land</p> <p><i>Action P11: Develop better understanding of the value and operating of employment and urban services land.</i></p>	<p>PP4 provides clear guidance to preserve employment and urban services land. It should also be noted that Planning Proposals are required to address Section 117 Direction 1.1 – <i>Business and Industrial Zones</i>, which outlines that employment and industrial zones must be retained. PP4 may duplicate the existing assessment process with the Section 117 direction.</p> <p>PP4 should be renumbered to PP5.</p>
<p>4.0</p> <p>A Liveable City</p>	<p>Priorities</p>	<p>Comments</p>
4.3 Improving housing choice	<p>4.3.1 Prepare local housing strategies</p> <p><i>Action L1: Prepare local housing strategies</i></p> <p>4.3.2 Understand the Greater Sydney housing market and demand</p> <p>4.3.3 Deliver West District's five-year housing supply target</p>	<p>The preparation of local housing studies by Councils to identify opportunities for additional capacity is a positive and welcome initiative of the draft Plan. Action L1 provides Councils with the flexibility to determine the most appropriate locations for new housing and to address local needs, through local knowledge.</p> <p>Council acknowledges and supports that the largest concentration of new dwellings in the District will occur in Penrith and aims to have a strategy to deliver the 5 and 20 year targets as set by the draft Plan. However, a close working relationship with the GSC and other relevant partners will be required to remove barriers to future housing supply, and to provide the infrastructure required to support growth areas.</p> <p>The benefit and relevance of this section within the draft Plan is unclear. The GSC should consider moving this section into a supporting background paper or as an addendum.</p> <p>LP1 outlines that Council's will be required to liaise with the GSC to identify barriers to delivering additional housing targets in accordance with the targets. The GSC must take on a facilitation role, provide strong leadership and be provided the authority to resolve matters where barriers to growth have been identified.</p>

	<p>LP1: Deliver West District's five-year housing supply targets</p>	<p>LP1 also states that Councils need to plan to provide sufficient capacity and monitor delivery of the 5 year housing targets, and that Planning Proposals need to demonstrate how this has been taken into account. It is proposed that for a more practical application of LP1 to Planning Proposals, this priority should state that the relevant Local Housing Strategy should be taken into consideration. To support this approach, the GSC should essentially 'endorse' all Council Local Housing Strategies to ensure they are granted an appropriate weight as part of the assessment against this priority.</p> <p>This section identifies a number of projects that are contributing to supply within the West District, including Ropes Crossing. Ropes Crossing forms part of the Blacktown Local Government Area and is not within the West District.</p>
	<p>4.3.4 Establish West District's 20-year strategic targets</p> <p><i>Action L2: Identify the opportunities to create the capacity to deliver 20-year strategic housing supply targets</i></p>	<p>Without any commitment to infrastructure, the establishment of 20-year housing targets are ambitious and it is recommended they be reconsidered. Based on the projections identified within the draft Plan, Penrith would most likely be expected to cater for approximately 70% of the West District's housing long-term housing targets (approximately 30,000 additional dwellings). As detailed in Council's submission, Council strongly believes that north-south rail connections could transform the District creating new centres and significantly increasing additional housing capacity. However without the identification of locations of new train stations and centres, identifying 20 year housing capacity is unachievable.</p> <p>It is recommended the GSC only consider 20 year housing targets when the <i>Future Transport Study</i> is prepared, new infrastructure connections are identified and when corridors are preserved. This will enable Council's to undertake yield analysis and identify if the proposed long-term targets are achievable.</p> <p>We reiterate that the GSC must be given the authority to act as facilitators and lead discussions with other State agencies in resolving barriers to future housing supply.</p>

	<p>4.3.5 Create housing capacity in the West District</p> <p><i>Action L3: Councils to increase housing capacity across the District</i></p>	<p>Council welcomes our role as the growth centre within the West District and in contributing to the bulk of the District’s housing supply. We support the investigation of new housing supply in a combination of infill development in existing centres, particularly in Greater Penrith and St Marys and the investigations for new release areas that have close access to major infrastructure. Council is currently preparing an updated Residential Strategy that aligns with these principles.</p> <p>Council is well informed of the risks to people and property arising from the Hawkesbury Nepean Valley and considers this a serious matter. The removal of existing obstacles relating to flooding and evacuation could open opportunities for significantly greater housing capacity within Penrith and Hawkesbury local government areas. To ensure that appropriate planning is undertaken when determining areas for future growth, it is fundamental that the Hawkesbury-Nepean Taskforce, Department of Planning and Environment (DP&E), Infrastructure NSW, the State Emergency Services and the GSC should collaborate closely within Council to ensure that flooding information and analysis is shared across organisations in order to resolve this matter.</p>
<p>4.4 Improve housing diversity and affordability</p>	<p>4.4.1 Plan for housing diversity</p> <p><i>Action L4: Encourage housing diversity</i></p> <p>LP2: Deliver housing diversity</p>	<p>Housing diversity must include planning for people to age in place, and affordable adaptable housing for people with disabilities.</p> <p>The Plan must include further details regarding the development and final details of the proposed housing diversity toolkit to support the preparation of local housing strategies, and how this will be implemented.</p> <p>The GSC should also investigate and champion specific housing policies or strategies that have been successfully implemented elsewhere in NSW and Sydney. It is recommended that the draft Plan should also include further detail on ‘incentives’ for the provision of a diversity of housing options, or provide this information on the proposed Dashboard.</p>

	<p>4.4.2 Support planning for adaptable housing and aged care</p>	<p>The significant shift in the nation’s ageing population is well known. For the West District, the number of persons aged 85 and over are expected to increase by almost 200% by 2036.</p> <p>Planning for adaptable housing and aged care is a critical issue that needs stronger guidance when planning for new housing. It is recommended that the GSC consider implementing guidelines or targets to encourage a greater representation of this type of development in new housing developments.</p>
	<p>4.4.4 Deliver Affordable Rental Housing</p> <p>LP3: Implement the Affordable Rental Housing Target</p> <p><i>Action L5: Independently assess need and viability</i></p> <p><i>Action L6: Support councils to achieve additional affordable housing</i></p> <p><i>Action L7: Provide guidance on Affordable Rental Housing Targets</i></p> <p><i>Action L8: Undertake broad approaches to facilitate affordable housing</i></p>	<p>Council provides unwavering support of the GSC in recognising the need for affordable housing and the application of mechanisms through the planning system to address this important issue.</p> <p>It is noted that the proposed approach only considers new rental housing and not housing for purchase more generally. It is recommended the GSC work with the State Government to investigate other mechanisms for more affordable housing for purchase.</p> <p>LP3 outlines that an affordable housing target of 5-10% of new floorspace (above the existing permissible floor space) will apply to urban renewal areas and new greenfield areas. The following comments are provided in response to the priority:</p> <ul style="list-style-type: none"> • Alternatives must be considered for locations where there are no new urban renewal areas or greenfield development • 5-10% target appears minimal compared to gains made from rezonings. It is likely where a range is proposed, developers will seek the minimal requirement only • It is important that affordable housing development are constructed at the same quality as non-affordable housing development and that poorer urban design outcomes are not considered as a trade-off. Underpinning any affordable housing contribution should be long-term and sustainable development. The GSC should also consider ensuring that a proportion of affordable housing is adaptable <p>Regarding Action LP5, Council looks forward to the GSC providing independent feasibility advice on development that includes an affordable housing component. Council anticipates that the GSC will advocate affordable housing within such projects. It is recommended the GSC prepare clear, publicly accessible guidelines regarding the feasibility testing process to ensure transparency.</p>

		<p>Action L6 identifies that the GSC will support Council's to achieve additional affordable housing by amending SEPP 70 - Affordable Housing (Revised Schemes). Council has recently adopted the Penrith Public Benefit Policy which provides development incentives in return for a Public Benefit (including affordable housing). It is recommended the GSC amend this action to support existing local planning mechanisms that seek to deliver more affordable housing.</p>
	<p>4.4.5 Support Social Housing</p> <p>LP4: Increase Social Housing Provision</p>	<p>Council has advocated to the previous Minister for Social Housing for the fast-tracking of Communities Plus developments in areas of older Land and Housing Corporation stock. The recognition of Communities Plus program is supported, and it is recommended this be reinforced through an action.</p> <p>Due to the scope of LP4, its application to relevant Planning Proposals would be limited. For this reason, it is recommended that the priority become an action or consider its inclusion the review of <i>A Plan for Growing Sydney</i>. The priority also outlines that 'optimal outcomes' should be developed for social housing sites. This seems to prioritise the delivery of social housing broadly over good urban design outcomes and urban amenity, which should be reconsidered.</p>
	<p>4.4.6 Facilitate integrated infrastructure planning</p> <p><i>Action L9: Coordinate infrastructure planning and delivery for growing communities</i></p>	<p>The planning and coordination of infrastructure to service new residential areas is fundamental to the delivery of new housing supply and in creating new communities. Consideration also needs to be made to the early delivery of retail and public transport in new developments to reduce car usage.</p> <p>Since local infrastructure is a fundamental part of the overall infrastructure suite, Council's should have a partner function in the delivery of Action L9.</p>

<p>4.5 Coordinate and monitor housing outcomes and demographic trends</p>	<p><i>Action L10: Provide data and projections on population and dwellings for local government areas across Greater Sydney</i></p>	<p>The DP&E population projections are a useful tool, however are often in conflict with other populations projections (such as id population experts). The DP&E should ensure that population projections are supported by plain-english documents that explain how the projections have been developed.</p>
<p>4.6 Create great places in the West District</p>	<p>4.6.1 Provide design-led planning</p> <p><i>Action L11: Provide design-led planning to support high quality urban design</i></p>	<p>Council supports the introduction of stronger design guidelines to deliver improved urban design outcomes, particularly in response to increasing pressures in providing housing supply. However, the effectiveness of the planning system to implement and enforce such design guidelines is often limited and difficult. The introduction of development codes and demotion of Development Control Plans as merely 'guidelines' has significantly reduced the ability of Council's to prioritise design-led planning outcomes.</p>
	<p>4.6.2 Plan for safe and healthy places</p> <p><i>Action L12: Develop guidelines for safe and healthy built environments</i></p> <p>LP5: Facilitate the delivery of safe and healthy places</p>	<p>Action L12 outlines that the GSC will work with the DP&E to prepare guidelines for developing a healthy and safe built environment. The Healthy Urban Development Checklist, developed by NSW Health, Premier's Council for Active Living, University of NSW and Heart Foundation currently provides sufficient guidelines for a healthy built environments, and Council would support these being built into planning mechanisms to ensure they are implemented.</p> <p>Council's capacity to achieve LP5 is inextricably linked with its ability to find local infrastructure and source State funding for district or State level infrastructure, and it is recommended the Plan recognise this nexus and its limitations.</p> <p>Whilst the intention of LP5 is supported, the practical assessment of Planning Proposals against this priority would not necessarily result in the matters identified in the priority being delivered (such as social infrastructure and community gardens). It is unlikely Council would seek to refuse a Planning Proposals where these items are not proposed as part of a development. It is recommended the priority should only apply where new release areas are planned or large-scale infill development is proposed.</p>

	<p>4.6.3: Enhance walking and cycling connections</p> <p>LP6: Facilitate enhanced walking and cycling connections</p>	<p>This is a welcome initiative, however in the West District, District and Regional walking and cycling connections are extremely limited at present. The requirement for Planning Proposals to demonstrate how they have given due consideration to the delivery of district and regional connections is unwarranted, as this places the responsibility of delivering district and regional-level infrastructure at a local level, and on the developer.</p> <p>With the capping of development contributions, it is not achievable for Council to deliver, nor feasible or equitable for private landowners to deliver regional or district connections.</p>
<p>4.7 Foster cohesive communities in the West District</p>	<p>4.7.1 Conserve and enhance the District's environmental heritage, including Aboriginal, European and natural</p> <p><i>Action L13: Conserve and enhance environmental heritage, including Aboriginal, European and natural</i></p> <p>LP7: Conserve heritage and unique local characteristics</p>	<p>Aboriginal Land Councils should be recognised as a partner within Action L13.</p> <p>Council has generally managed to retain and conserve heritage items via the Planning System (LEP), and the Penrith LEP 2010 is already consistent with this priority. It should also be noted that Planning Proposals are required to address Section 117 Direction 2.3 <i>Heritage Conservation</i>, which promotes the retention of heritage provisions. The application of this priority to Planning Proposals may duplicate the existing assessment process with the Section 117 direction.</p>
	<p>4.7.2 Support the creative arts and culture</p> <p>LP8: Foster the creative arts and culture</p>	<p>LP8, which Council supports through initiatives such as our 'Placemaking through Public Art Policy', is limited by constraints on funding public art and library books in new development through s94 Contributions Plans. Expected new standards for base level local infrastructure flagged in the Planning White Paper also proposed significantly curtailing cultural and artistic facilities and features.</p> <p>If the DP&E's lowered standards on local infrastructure are implemented, either the Plan should be amended to reflect these constraints, or the GSC should lobby the DP&E to seek enhanced, permissible local infrastructure standards or investigate alternative funding mechanisms for the infrastructure gap.</p>

	<p>4.7.3 Create opportunities for more recreation and community facilities</p> <p><i>Action L14: Develop a West District sport and recreation participation strategy and recreation facility plan</i></p>	<p>Council welcomes the inclusion of recreation planning at a District level. We recommend the GSC complement the Strategy with participation pilots across the District. This pilot may be the logical next step in achieving participation, as well as testing the suitability of the Strategy.</p> <p>The term ‘recreation’ should also include informal and passive recreation opportunities as part of any future strategies.</p>
	<p>4.7.4 Support planning for shared spaces</p> <p><i>Action L15: Support planning for shared spaces</i></p> <p>LP9: Share resources and spaces</p>	<p>Council welcomes the support of the GSC and the Department of Education in increasing community facilities. Council’s experience has been challenging to date and we have experienced difficulties with implementation.</p> <p>It should be noted that LP9 is unlikely to have any significant impact throughout the Planning Proposals process as its application to will be limited. It is also considered that planning authorities are largely limited in enforcing any rules or restrictions on the use of such facilities, beyond the development assessment process.</p> <p>It is recommended that relevant State agencies, instead of relevant planning authorities, be responsible for the delivery of this priority.</p>
<p>4.8 Responding to people’s need for services</p>	<p>4.8.2 Plan to meet the demand for school facilities</p> <p>LP10: Support innovative school planning and delivery</p> <p><i>Action L16: Support planning for school facilities</i></p>	<p>LP10 outlines that planning authorities should consider implementing innovative land use and development approaches to new schools and planning mechanisms to incentivise mixed-use development and shared facilities, as part of any relevant Planning Proposal. As the development of schools is largely governed by SEPP provisions, it is unlikely that any Planning Proposals would be relevant to LP10.</p> <p>It is recommended this action highlight a commitment to permanent school facilities that offer high-quality classroom spaces that provide good lighting, ventilation, temperature control for students.</p>

	4.8.3 Plan for the provision of early education services and child care facilities	
	4.8.4 Support the provision of youth services	Planning for culturally appropriate infrastructure and services may be better considered at the Greater Sydney level, to ensure a broader strategic approach for these services.
	<p>4.8.5 Support the Aboriginal Community</p> <p>LP11: Provide socially and culturally appropriate infrastructure and services</p> <p><i>Action L17: Support the provision of cultural appropriate services</i></p>	<p>Council is conscious of the need to provide services that are culturally appropriate and welcomes the opportunity to provide input on an engagement strategy.</p> <p>LP11 is limited in its relevance to the Planning Proposal process. It is also generally not considered a responsibility local government can enforce through the Planning Proposal process, through local planning strategies or Local Environmental Plans. Ongoing engagement opportunities on this matter through alternative forums are welcomed.</p> <p>Planning for culturally appropriate infrastructure and services may be better considered at the Greater Sydney level, to ensure a broader strategic approach for these services.</p>
	4.8.6 Support planning for health networks	

	<p>4.8.7 Plan for health facilities and services</p> <p>LP12: Support planning for health infrastructure</p>	<p>Council strongly supports the protection of health precincts, however there also needs to be a focus on the delivery of supporting infrastructure including more frequent train and bus services and parking. There is a challenge in determining the balance between residential encroachment and planning for the future growth of such precincts – these precincts tend to have a significant workforce, including key workers.</p>
	<p>4.8.8 Plan for emergency services</p> <p>LP 13: Support planning for emergency services</p> <p><i>Action L18: Support planning for emergency services</i></p>	<p>Planning for emergency services may be better considered at the Greater Sydney level, to ensure a broader strategic approach for these services.</p>
	<p>4.8.9 Plan for cemeteries and crematoria</p> <p>LP14: Support planning for cemeteries and crematoria</p> <p><i>Action L19: Support planning for cemeteries and crematoria</i></p>	<p>Planning for cemeteries and crematoria may be better considered at the Greater Sydney level, to ensure a broader strategic approach for these facilities.</p>
5.0	Priorities	Comments
A Sustainable City		
5.2 Enhancing the West District in its landscape		<p>The introduction of SP1 is a welcome initiative and a positive step towards improving water quality within the District.</p>
	SP1: Maintain or restore water quality and waterway health	<p>Council welcomes the emphasis on greater collaboration between stakeholders in the management of South Creek, Penrith Lakes and other waterways throughout the District.</p>

<p>5.3 Protecting the District's Waterways</p>	<p><i>Action S1: Review criteria for monitoring water quality and waterway health</i></p> <p><i>Action S2: Protect the South Creek environment and use development approaches to achieve excellent environment performance</i></p> <p><i>Action S3: Improve the management of waterways in the Priority Growth Areas</i></p>	<p>It appears that the draft Plan has a focus on South Creek at the expense of the Nepean River and the Penrith Lakes. These areas also require recognition of their value to the West District as well as targeted programs to ensure they are protected into the future. It is recommended Action S2 be expanded to include reference to the District's other major waterways.</p> <p>Council welcomes the opportunity to provide input for the creation of development controls/guidelines for the management of riparian corridors within the Western Sydney Priority Growth Area, as outlined in Action S3. However, there is a need to establish and implement in a holistic and integrated manner across the catchment, the principles of water sensitive urban design into all new developments.</p>
	<p>5.3.1 Managing the District's estuaries</p>	
<p>5.4 Protecting and enhancing biodiversity</p>	<p>SP2: Avoid and minimise impacts to biodiversity</p> <p><i>Action S4: Develop a Strategic Conservation Plan for Western Sydney</i></p> <p><i>Action S5: Update information on areas of high environmental value</i></p>	<p>The application of SP2 through the Planning Proposal process is unclear, as it does not provide any direct link or actions for Councils to undertake within the Planning Proposal process.</p> <p>As outlined in Action S4, a Strategic Conservation Plan for Western Sydney should provide clear direction to Councils and developers on what is acceptable development, particularly within areas of high biodiversity value. There should be some recognition that the Cumberland Subregion is unique and requires a focused effort to protect and conserve remaining significant natural assets. The Office of Environment and Heritage produced a Cumberland Subregion Biodiversity Investment Opportunities Map (BIO Map) a few years ago to identify where investment funding and initiatives should be directed to achieve the greatest benefit.</p>
<p>5.5 Delivering Sydney's Green Grid</p>	<p>SP3: Align strategic planning to the vision for the Green Grid</p>	

	<p>SP4: Protect, enhance and extend the urban canopy</p> <p>SP5: Improve protection of ridgelines and scenic areas</p> <p><i>Action S6: Use funding programs to deliver the West District Green Grid Priorities</i></p> <p><i>Action S7: Develop support tools and methodologies for local open space planning</i></p> <p><i>Action S8: Update the Urban Green Cover in NSW Technical Guidelines to respond to solar access to roofs</i></p>	<p>The focus on the Green and Blue Grid within the draft Plan is to be commended. SP3, SP4 and SP5 provide clear guidance to support the delivery of the Green Grid, and clearly articulate the need to preserve these important environmental corridors. Street tree planting plays a significant role in providing an urban canopy. Current funding available under the Metropolitan Greenspace Program is not targeted at street tree planting programs and the significant cost of street tree planting projects often makes them uncompetitive in other grant programs.</p> <p>SP4 is commendable but could be enhanced by specific actions within the draft Plan, rather than being incorporated into the individual council planning documents and Planning Proposals. It is recommended the GSC consider identifying targets for canopy cover in urban areas. This is an important issue for Penrith and the West District due to the urban heat island effect and higher temperatures experienced compared to the rest of Greater Sydney. Council would welcome the opportunity to develop targets for canopy cover in consultation with the GSC. It should also be the responsibility of State Government to meet these targets when delivering state funded projects. It is recommended this be reflected in SP4.</p> <p>A standardised mapping program to track changes in canopy cover over time across the Metropolitan and District areas would also be valuable. This could be included as part of the GSC's Dashboard program.</p> <p>The tools outlined in S7 are supported, however it is important that underpinning these tools are the principles that open space is responsive to current and future community needs and the settings in which they are located, and that open space is high quality, robust and low maintenance.</p> <p>Figure 5-3 Open Space and Green Grid on page 124 of the draft Plan identifies incorrect locations to the corresponding Green Grid project.</p>
5.6 Managing the Metropolitan Rural Area	SP6: Discourage urban development in the Metropolitan Rural Area	Council considers that the Metropolitan Rural Area (MRA) is important in terms of defining not only the West District, but all of Metropolitan Sydney. The draft Plan outlines the range of environmental, social and economic values of the MRA and the role it plays in supporting various land uses and activities. However, it does not fully recognise the

	<p>SP7: Consider environmental, social and economic values when planning for the Metropolitan Rural Area</p> <p>SP8: Provide for rural residential development while protecting the values of the Metropolitan Rural Area</p>	<p>benefits of the MRA in terms of helping to secure Sydney’s food supply into the future and mitigating and adapting to climate change impacts.</p> <p>While Council supports the inclusion of the priorities for managing the MRA, they do not provide clear guidance on the long term role of the MRA, including in terms of its agricultural productivity. The priorities do not help to protect the values of the MRA, with terms such as ‘discourage’ instead of ‘prevent’ and ‘consider’ instead of ‘protect’. Consequently, the MRA will continue to be seen as ‘urban land in waiting’.</p> <p>The priorities also place responsibility for managing the MRA primarily on individual councils. However, it is important that a holistic approach is taken, as recognised, for example, in the Sydney Peri-Urban Network of Councils (SPUN) Action Plan.</p> <p>The priorities should be supported by actions, including:</p> <ul style="list-style-type: none"> • Prepare a Policy on Agriculture in the Sydney Region that identifies and protects agricultural lands and opportunities (e.g. proximity to Western Sydney Airport) • Prepare local planning strategies for the MRA • Adopt a design-led approach to planning for rural residential development <p>It is noted that SP8 includes a statement that “How these matters have been taken into account is to be demonstrated in any relevant planning proposal”. It is suggested that this statement is also relevant to SP6 and SP7.</p>
<p>5.7 Creating an efficient West District</p>	<p>5.7.1 Waste management</p> <p>SP9: Support opportunities for District waste management</p> <p><i>Action S9: Identify land for future waste reuse and recycling</i></p>	<p>The inclusion of waste management planning is a significant issue in the context of changing housing patterns and projected population increases.</p> <p>Council welcomes the opportunity to assist in identifying appropriate land for waste management, reuse and recycling. However, planning for waste management may be better considered at the Greater Sydney level, to ensure a broader strategic approach for these services.</p>
	<p>5.7.2 Energy and water</p>	<p>Council supports the inclusion of actions from the Draft Climate Change Fund Strategic Plan into local planning decisions but it appears this may be duplicating policies that are already</p>

	<p><i>Action S10: Embed the NSW Climate Change Policy Framework into local planning decisions</i></p> <p><i>Action S11: Support the development of new initiatives for a sustainable low carbon future</i></p> <p><i>Action S12: Support the development of efficiency and environmental performance benchmarks</i></p>	<p>be in place through Local Environmental Plans, Development Control Plans and BASIX requirements.</p> <p>Given the significant likely impacts of climate change and the commitment by the State Government to a target of zero net emissions by 2050 there is a need to look at opportunities to improve the environmental performance of buildings and homes within the District. This is particularly important given mapping highlights the fringes of Sydney, including Penrith, have higher greenhouse gas emissions per household than the rest of Greater Sydney. Action S11 may not be necessary if Action S10 effectively identifies new policies that contribute to the same outcome.</p> <p>The development of efficiency and environmental benchmarks as outlined in Action S12 is positive, however their use only in urban renewal and infrastructure projects limits the scope of their application.</p> <p>Greenhouse gas emissions are significantly higher from transport emissions due to the reliance on private vehicle travel within the West District. While there is mention of electric vehicles and charging locations, other options also need to be of focus, including significant mode shift to public transport and greater active travel where infrastructure is available.</p>
<p>5.8 Planning for a resilient West District</p>	<p>SP10: Mitigate the urban heat island effect</p> <p>SP11: Integrate land use and transport planning to consider emergency evacuation needs</p> <p>SP12: Use buffers to manage the impacts of rural activities on noise, odour and air quality</p> <p>SP13: Assist local communities to develop a coordinated understanding of</p>	<p>Council strongly supports the identification of the urban heat island effect through SP10 and Action S13. It is important that the inclusion of urban heat considerations into development assessment processes at the local and state level are implemented.</p> <p>Mitigating the urban heat island effect could also be supported by the use of innovative heat reflective materials and other ways of reducing the heat load in particularly vulnerable locations and new developments through development standards. Council currently does this through Development Control Plans, however implementation and enforcement of these measures is challenging to date, due to the perceived cost implications of these measures.</p> <p>It is important that the State Government supports such measures, by ensuring these principles are incorporated into Priority Growth Centres and through State Environmental Planning Policies.</p>

	<p>natural hazards and responses that reduce risk</p> <p><i>Action S13: Incorporate the mitigation of the urban heat island effect into planning for urban renewal and Priority Growth Areas</i></p> <p><i>Action S14: Review the guidelines for air quality and noise measures for development near rail corridors and busy roads.</i></p> <p><i>Action S15: Identify and map potential high impact areas for noise and air pollution</i></p>	<p>SP11 recognises the importance of planning to consider emergency evacuation needs. As detailed in Council's submission, Council recognises and understands the risks associated with flooding and evacuation. To ensure that appropriate planning is undertaken when determining locations for future growth, it is fundamental that the Hawkesbury-Nepean Flood Taskforce, DP&E, Infrastructure NSW, the State Emergency Services and the GSC should collaborate closely within Council to ensure that flooding information and analysis is shared across organisations in order to resolve this matter. This priority should specifically recognise the responsibility of the Hawkesbury-Nepean Flood Taskforce and its work on regional flood evacuation.</p> <p>It is also critical that developers are not burdened with the responsibility for providing infrastructure to alleviate the regional evacuation issues, or be required to prepare extensive and costly studies.</p>
<p>5.9 Managing flood hazards in the Hawkesbury-Nepean Valley</p>	<p><i>Action S16: Address flood risk issues in the Hawkesbury-Nepean Valley</i></p>	<p>Council's resources are inadequate to develop all Floodplain Risk Management Plans within a short period of time, therefore assistance from other sources will be required. Similarly, Councils do not have adequate funds to implement flood mitigation works required to upgrade infrastructure to support evacuation measures. Therefore it is important to recognise the need to consider alternative finance arrangements for flood mitigation works required to address flood risk.</p> <p>Regional information held by the Hawkesbury Nepean Flood Risk Management Taskforce must be made available to local Councils in order to appropriately inform regional and local flood planning management strategies and policies.</p> <p>It is recommended Action S16 be amended to '<i>Address flood risk, flood planning, flood mitigation and flood responses in the Hawkesbury-Nepean Valley</i>' and detail the following:</p> <ul style="list-style-type: none"> • Prioritise the need to implement the findings of the Hawkesbury-Nepean Valley Flood Risk Management Strategy

		<ul style="list-style-type: none">• Investigate alternative finance mechanisms to deliver flood mitigation works• Identify the required flood mitigation works required to address flood risk• Implement flood mitigation works to improve flood evacuation routes
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